

CHAPTER 3 REVISIONS, CLARIFICATIONS, & CORRECTIONS

1. Introduction

In accordance with Section 15132(a) of the California Environmental Quality Act (CEQA) Guidelines, this Chapter of the Final Environmental Impact Report (EIR) provides revisions, clarifications, and corrections to the Draft EIR as a result of public and agency comments received in response to the circulated Draft EIR, or due to recognition of inadvertent errors or omissions. Such changes are a result of public and agency comments received in response to the Draft EIR and/or additional information that has become available since publication of the Draft EIR. The revisions, clarifications, and corrections provided in this Chapter do not add significant new information or support a conclusion that the Project would result in new or increased significant environmental impacts as compared to those disclosed in the circulated Draft EIR.

CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states: “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”

CEQA Guidelines Section 15088.5 also provides that “[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

As demonstrated in this Final EIR, the changes presented in this Chapter do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines

Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

Subsection 2, *Revisions, Clarifications, and Corrections of Draft EIR Sections and Appendices*, provides corrections to the Draft EIR and its appendices.

Subsection 3, *Modified Alternative 2*, below, describes the Modified Alternative 2, which is based largely on Alternative 2, the Primarily Residential-Mixed Use Alternative, presented in the Draft EIR. Alternative 2 was deemed the “Environmentally Superior Alternative” in the Draft EIR. As evaluated below, the Modified Alternative 2 would further reduce the environmental impacts of Alternative 2 by eliminating the Project and Alternative 2’s Building 2 component on Vista Del Mar Avenue. As shown in the evaluation below, it would be more environmentally beneficial than the Project, as evaluated in the Draft EIR. The Modified Alternative 2 was formulated in response to certain environmental concerns expressed by commenters and pursuant to guidance offered by the City after considering the public comments. The City will also consider Modified Alternative 2.

Subsection 4, *Effects of Revisions, Clarifications and Corrections*, describes how the revisions, clarifications, and corrections presented in this Chapter do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5.

2. Revisions, Clarifications and Corrections to Draft EIR Sections and Appendices

Revisions, clarifications, and corrections to the Draft EIR are indicated below under the respective EIR section heading, page number, and paragraph. Paragraph references are to the first full paragraph on the page. Deletions are shown with ~~strikethrough~~ and additions are shown with double underline. Existing text to remain unchanged is included as plain text, without strikethrough or double underlines, to provide context for the revisions, clarifications, and corrections.

Chapter 1, Executive Summary

1. Page ES-4 and ES-5, revise following paragraphs as follows:

Construction Groundborne Vibration/Noise. Implementation of MM-NOI-3 ~~would ensure that construction groundborne vibration levels would be below the significance threshold of 0.2 inches per second (PPV) for potential structural damage impacts at the nearest single-family residential building adjacent to the site along Vista Del Mar Avenue (R3). This mitigation measure requires a 15-foot buffer between the nearest residential building and heavy construction equipment operations. At 15 feet, the groundborne vibration levels would be reduced to 0.191 inches per second (PPV). The mitigated level of 0.191 inches per second (PPV) is less than, but still close to the significance threshold of 0.2 inches per second (PPV). Therefore, MM-NOI-4 is also recommended~~ implemented to mitigate potential groundborne vibration impacts, which calls for the implementation of a groundborne vibration monitoring program. ~~Implementation of MM-NOI-4 would ensure that groundborne vibration levels are below the thresholds associated with~~

~~potential damage to the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) due to Project construction. However because MM-NOI-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable.~~

~~In addition, t~~Temporary construction-related groundborne vibration and groundborne noise impacts on human annoyance would be reduced at the adjacent residential uses along the west side Vista Del Mar Avenue with implementation of Mitigation Measures MM-NOI-3 and MM-NOI-4 (represented by measurement location/sensitive receptor location R3). However, given that the groundborne vibration level would be close to but still under the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures. Therefore, temporary construction-related groundborne vibration ~~structural and groundborne vibration and~~ noise human annoyance impacts would be significant and unavoidable.

2. Page ES-36, in Table ES-1, revise the first column from the left, second row next to MM-NOI-3 as follows:

Construction of the Project would generate groundborne construction noise and vibration during site clearing, grading and shoring. Construction activities immediately adjacent to the property line could produce groundborne vibration velocities that exceed applicable vibration thresholds. As such, the Project's impact related to groundborne vibration during construction is considered to be potentially significant. Mitigation is required. Implementation of MM-NOISE-3 and MM-NOISE-4 would reduce construction groundborne noise and vibration to less than significant levels with respect to building damage, but would be significant and unavoidable for human annoyance. ~~However, because impacts would be close to and potentially exceed thresholds, and for MM-NOISE-4 requiring consent of adjacent property owners, who may not agree, impacts are concluded to be significant and unavoidable.~~

3. Page ES-36, in Table ES-1, revise the third column from the left, second row next to MM-NOI-3 as follows:

Significant and Unavoidable for human annoyance, less than significant with mitigation for building damage

4. Pages ES-37 to ES-40, revise MM-NOI-4 as follows:

MM-NOI-4: Prior to start of construction, the Project Applicant shall retain the services of a licensed building inspector, or structural engineer, or other qualified professional as approved by the City, to inspect and document (video and/or photographic) the apparent physical condition of the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3), including but not limited to the building structure, interior wall, and ceiling finishes.

The Project Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a groundborne vibration monitoring program capable of documenting the construction-related groundborne vibration levels at each residence during demolition, excavation, and construction of the parking garages. The groundborne vibration monitoring program shall measure (in vertical and horizontal directions) and continuously store the peak particle velocity (PPV) in inch/second. Groundborne vibration data shall be stored on a two-second interval. The program shall also be programmed for two preset velocity levels: a warning level of 0.15 inch/second PPV and a regulatory level of 0.2 inch/second PPV. The program shall also provide real-time alerts when the groundborne vibration levels exceed the two preset levels. Monitoring shall be conducted at a feasible location between the Project Site and the residential buildings along Vista del Mar Avenue adjacent to the Project Site as near to the adjacent residential structures as possible.

- The groundborne vibration monitoring program shall be submitted to the Department of Building and Safety, prior to initiating any construction activities for approval.
- In the event the warning level (0.15 inch/second PPV) is triggered, the contractor shall identify the source of groundborne vibration generation and provide feasible steps to reduce the groundborne vibration level such as halting/staggering concurrent activities or utilizing lower vibratory techniques.
- In the event the regulatory level (0.2 inch/second PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the affected residences and visually inspect the affected residences for any damage. Results of the inspection must be logged. The contractor shall identify the source of groundborne vibration generation and implement feasible steps to reduce the groundborne vibration level such as staggering concurrent activities or utilizing lower vibratory techniques. Construction activities may continue upon implementation of feasible steps to reduce the groundborne vibration level.
- In the event damage occurs to the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) due to Project construction groundborne vibration, such materials shall be repaired to the same or better physical condition as documented in the pre-construction inspection and video and/or photographic records. Any such repair work shall be conducted in accordance with the Secretary of Interior's Standards for Rehabilitation pursuant to CEQA Guidelines Section 15064.5, subsection (b)(3).

5. Pages ES-50 and ES-51, revise MM-TRAF-1 as follows:

MM-TRAF-1: Transportation Demand Management Program. The Project Applicant shall prepare and implement a comprehensive Transportation Demand Management (TDM) Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the Project. ~~The TDM Program shall be subject to review and approval by the Department of City Planning and LADOT. A covenant and agreement shall be implemented to ensure that the TDM Program shall be maintained. The exact measures to be implemented shall be determined when the Program is prepared, prior to issuance of a final certificate of occupancy for the Project.~~ The TDM Program shall ensure that the Project VMT would be below the applicable VMT threshold(s) established in the

Transportation Assessment Guidelines through such means that could include monitoring or reporting, as required by the City. The strategies in the TDM Program shall include at a minimum, the following:

- Unbundled Parking: Provision of unbundled parking for residents (i.e., parking space is leased separately from dwelling units); and
- Promotions and Marketing: Employees and residents shall be provided with materials and promotions encouraging use of alternative modes of transportation. This type of campaign would raise awareness of the options available to people who may never consider any alternatives to driving.

In addition, the TDM could include measures such as:

- ~~Short-term car rentals;~~
- ~~Incentives for using alternative travel modes (such as transit passes);~~
- ~~Guaranteed ride home program for employees;~~
- ~~Parking incentives and administrative support for formation of carpools/vanpools; and/or~~
- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator;
- Design the project to ensure a bicycle, transit, and pedestrian friendly environment;
- Accommodate flexible/alternative work schedules and telecommuting programs;
- A provision requiring compliance with the State Parking Cash-out Law in all leases;
- Coordinate with DOT to determine if the project location is eligible for a future Integrated Mobility Hub (which can include space for a bike share kiosk, and/or parking spaces on-site for car-share vehicles);
- Provide on-site transit routing and schedule information;
- Provide a program to discount transit passes for residents/employees possibly through negotiated bulk purchasing of passes with transit providers;
- Provide rideshare matching services;
- Preferential rideshare loading/unloading or parking location;
- Contribute a one-time fixed fee contribution of \$75,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the vicinity of the Project; and/or
- Participation as a member in the future Hollywood Transportation Management Organization (TMO), when operational. When the Hollywood TMO becomes operational, the Hollywood TMO's services may replace some of the in-house TDM services where applicable.

In addition to these TDM measures, DOT also recommends that the applicant explore the implementation of an on-demand van, shuttle or tram service that connects the project employees to off-site transit stops (such as the Metro Red Line stations) based on the transportation needs of the project's employees. Such a service can be included as an additional measure in the TDM program if it is deemed feasible and effective by the applicant.

Chapter II, Project Description

1. Page II-1, revise the 5th sentence in the 2nd paragraph as follows:

The Project would consist of two buildings, Building 1 and Building 2. Building 1 of the Project, located at the southeast corner of Yucca/Argyle, would occupy the majority of the Project Site. It would include a six-level podium parking structure with: two fully subterranean levels (P3 and P2 Levels); two semi-subterranean levels (P1 and L1 Levels – due to site’s sloping topography); and two entirely above-ground levels (L2 and L3). Atop Level 3 (the highest podium level), Building 1 would include Levels 4 through 20. Thus, Building 1 would be 255 feet tall as viewed from Argyle Avenue (at the lowest adjacent surface point along Argyle Avenue). From Yucca Street, Building 1 would be 20 stories tall (ranging from approximately 40 feet to 250 feet). Level L1 primarily fronts Yucca Street. Building 1 would include a mix of commercial, hotel and residential uses (240 ~~197~~ residential units). Building 2, located at the southwest corner of Yucca Street and Vista Del Mar Avenue, would include three residential levels (with 13 residential units total) over a 2-story podium parking structure, which would include one subterranean parking level (P2 Level) and one semi-subterranean parking level (P1 Level). Building 2 would have a maximum elevation of approximately 34 feet as viewed from Yucca Street. Due to the sloping topography along Vista Del Mar Avenue, the maximum elevation of Building 2 at the southern Project Site boundary would be approximately 47 feet, as a portion of the semi-subterranean P1 parking level would be visible from Vista Del Mar Avenue at this location. Building 2 would contain only residential uses.

2. Page II-14, revise the 1st sentence as follows:

Building 1 would include 240 ~~197~~ residential units, representing approximately 211,068 gross square feet of residential floor area, located on Level 4 and Levels 9 through 20

3. Page II-36, revise 1st bullet point under section 9. Necessary Approval as follows:

- **Zone Change and Height District Change:** The West Parcel is currently zoned C4-2D-SN, the Center Parcel is currently zoned R4-2D, and the East Parcels are currently zoned [Q]R3-1XL. The Project would require a zone change and a height district change for the Center Parcel from R4-2D to C2-2, a zone change and height district change for the West Parcel from ~~to remove the D Limitation (C4-2D-SN to C2-2D-SN)~~, and a zone change for removal of the “[Q]” and a height district change for the East Parcels from ~~{[Q]R3-1XL to R3-2D}~~ pursuant to LAMC Section 12.32 in order to allow development of the Project.

Section IV. C, Cultural Resources

1. Page IV.C-20, revise 1st full paragraph as follows:

(i) Historical Resources Identified within the Project Site

For the purposes of the analysis in this Draft EIR, 1771 and 1765 North Vista del Mar Avenue (contributors to the Vista del Mar/Carlos Historic District), and 6210-6218 and 6220-6224 Yucca Street and 1756-1760 North Argyle Avenue (Yucca Argyle Apartments), were re-evaluated; ~~pursuant to PRC, Article 2, Section 5024.1(g)(4), which provides for the update of survey and re-~~

~~evaluation of historical resources after five years to account for changed circumstances or further documentation. to determine whether their proposed demolition as part of the Project would result in a substantial adverse change to the Vista del Mar/Carlos Historic District.~~ The current architectural description and significance evaluation is included in the Historical Resources Assessment and Historical Resources Peer Review Report included Report in Appendix D in this Draft EIR.

2. Page IV.C-42-43, revise following paragraph as follows:

Two other related projects in the immediate vicinity of the Project include the 16-story Kimpton Everly Hotel at the northeast intersection of Yucca Street and Argyle Avenue, and the Millennium Hollywood Mixed-Use Project southwest of the intersection of Yucca Street and Argyle Avenue. While construction of both the Argyle Hotel and Millennium Hollywood Mixed-Use Project (now called Hollywood Center) are not demolishing or altering any historical resources, the projects anticipate introducing improvements with greater densities on their respective sites. While both of these projects may block views of the Capitol Records Building, they would not have a cumulative effect in conjunction with the Project because views of the Capitol Records Building from the Project Site do not involve view blockage from any valued vantage points ~~and would be blocked by the Argyle House project, which are closer to the Capital Records Building, as discussed above. The cumulative impact on views of the Capitol Records Tower Building as a result of the Argyle Hotel and Millennium Hollywood Mixed-Use Project would not have any impact on the setting of the Capitol Records Building and would not involve any blockage of views of the building from any valued vantage points. The Project, combined with the Kimpton Hotel, Millennium (Hollywood Center), and Argyle House would not create any cumulative impacts on historical resources or on the settings of any such resources, including the Capitol Records Building, and the Project would not contribute to any cumulatively significant blockage of views of any such historic buildings from valued vantage points.~~ Following implementation of the Project, adjacent historical resources would retain their eligibility for historic designation and the Project's contribution to cumulative impacts in light of the Yucca Street Condo, Hotel Argyle, and Millennium Hollywood Mixed-Use projects would not be cumulatively considerable. Accordingly, the cumulative impact of the Project on surrounding historical resources would be less than significant.

Section IV. H, Land Use and Planning

1. Page IV.H-42, revise the first two full paragraphs on the page as follows:

The Project would require a height district change for the West Parcel to remove the Development Limitation ("D") of 2:1 FAR. The Project would require a zone change and a height district change for the Center Parcel from R4-2D to C2-2D to be consistent with the existing Regional Center Commercial General Plan land use designation and allow commercial uses, and to remove the current Development Limitation (D) providing for a maximum of 2:1 FAR. For the East Parcel, the Project would require a zone change for removal of the [Q] condition, which limits residential density to a maximum of one dwelling unit for each 1,200 square feet of lot area to allow density of one unit per 974 square feet (45 units per acre). As further discussed in Section IV.A,

Aesthetics, of this Draft EIR, the Project would be consistent with the Sign District with the incorporation of PDF-AES-2, which would ensure uniform signage on the West and Center Parcels.

Table IV.H-6, *Comparison of the Project to Applicable Land Use Regulations of the LAMC*, evaluates the consistency of the Project with applicable policies of the LAMC. As discussed in Table IV.H-6, the Project would be consistent with the provisions of the LAMC zone and height district changes, conditional uses, and Site Plan Review, subject to certain conditions and findings. With the approval of the requested entitlements the Project would be consistent with the density, FAR, height, and uses within the C42-2D-SN, C42-2, and R3-2D zones. The Project would be consistent with open space, setback, and landscaping requirements of the LAMC.

2. Page IV.H-43, revise the first row in Table IV.H-6 as follows:

Code Section	Code Provision	Would the Project Conflict?
Section 12.1416.A (Permitted Uses in the C42 Zone) and Section 12.22.A.18(a) (Development Combining Residential and Commercial Uses)	Permitted uses include any uses permitted in the "C2" Commercial Zone, including multi-family residential, hotel, retail, and restaurant uses. Permitted uses when designated in a Regional Center also include any uses permitted in the "R5" Multiple Dwelling Zone, including any uses in the "R4" Multiple Dwelling Zone, such as multi-family residential, group homes, and hotels.	No Conflict. The proposed multi-family, hotel, and commercial/restaurant uses on the West Parcel are consistent with the C2 zoning designation. The Project would require a zone change on the Center Parcel from R4 to C2 to permit the proposed commercial uses and to be consistent with the underlying Regional Center Commercial land use designation of the Hollywood Community Plan. With the zone change, the Project's uses would be consistent with the LAMC.

3. Page IV.H-43, revise the fourth row in Table IV.H-6 as follows:

Code Section	Code Provision	Would the Project Conflict?
Section 12.1416.C (Setbacks in the C42 zone)	Front Yard – Not required. Side and Rear Yards – Not required for buildings erected and used exclusively for commercial purposes. For all portions of buildings erected and used for residential purposes, side, and rear yards conforming to the requirements of the R4 Zone shall be provided and maintained at the floor level of the first story used for residential purposes.	No Conflict. Building 1 on the West and Center Parcels would not be required to provide front and side yard in C42 zone. The Project would provide a 16-foot setback from the south property line.

4. Page IV.H-44, revise the 2nd row in Table IV.H-6 as follows:

Code Section	Code Provision	Would the Project Conflict?
Section 12.1416.C.3 (Lot Area in the C42 Zone) Section 12.144.C.4 (Lot Area in the R4 Zone) Section 12.22.A.18 (Development Combining Residential and Commercial Uses) Section 12.12.C.4 (Lot Area in the R5 Zone) Section 12.10.C.4 (Lot Area in the R3 Zone) [Q] Condition (Ordinance No. 165662)	C42 – Same as R4. C42 – If within a designated Regional Center the same as R5. R5 – Every lot shall have a minimum lot area per dwelling unit of 200 square feet. R4 – Every lot shall have a minimum lot area per dwelling unit of 400 square feet. R3 – Every lot shall have a minimum lot area per dwelling unit of 800 square feet. The [Q] Condition limits residential density in the R3 zone to a minimum lot area per dwelling unit of 1,200 square feet.	No Conflict. The West Parcel (C4 within a Regional Center) currently permits a minimum lot area per dwelling unit of 200 square feet (98 units); the Center Parcel (R4) currently permits a minimum lot area of 400 square feet per dwelling unit (49 units); and the East Parcel currently permits a minimum lot area of 1,200 square feet per dwelling unit (9 units) for a total of 156 units. The Project would require a zone change on the Center Parcel from R4 to C2 to be consistent with the underlying Regional Center Commercial General Plan land use designation which would permit a minimum lot area of 200 square feet per dwelling unit or 98 units (total of 196 units). The Project would also require a zone change to remove the [Q] Condition on the East Parcel to permit a minimum lot area of 800 square feet per dwelling unit or 14 units. With the approval of the requested zone changes, a total of 210 dwelling units would be permitted on the Project Site.

Section IV. I, Noise

1. Page IV.I-15, revise the last paragraph on the page as follows:

Residential Uses: Existing one- and two-story single-family residences and duplexes are located adjacent and to the east and south of the Project Site along Vista Del Mar Avenue, including buildings identified as contributors to the Vista del Mar Historic District, as set forth under Section IV.C, Cultural Resources.

Page IV.I-23, revise the last paragraph on the page as follows:

The FTA's document also provides groundborne vibration human annoyance criteria. The nearest off-site buildings to the Project Site that could be subjected to Project-related groundborne vibration structural damage and human annoyance impacts are the residential uses located along Vista Del Mar Avenue (less than 50 feet from the Project Site), including those uses identified as being part of the Vista del Mar Historic District, as discussed in Section IV.C, Cultural Resources, because those residential uses are located within groundborne vibration and groundborne noise analysis screening distance by FTA⁶³ and have the potential to experience perceptible groundborne vibration due to short-term construction and longterm Project operations. These

uses consist of non-engineered timber and masonry buildings that are residences where people normally sleep and are not considered to be fragile buildings or otherwise particularly susceptible to damage from groundborne noise.¹

2. Page IV.I-59, revise MM-NOI-4 as follows:

MM-NOI-4: Prior to start of construction, the Project Applicant shall retain the services of a licensed building inspector, or structural engineer, or other qualified professional as approved by the City, to inspect and document (video and/or photographic) the apparent physical condition of the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3), including but not limited to the building structure, interior wall, and ceiling finishes.

The Project Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a groundborne vibration monitoring program capable of documenting the construction-related groundborne vibration levels at each residence during demolition, excavation, and construction of the parking garages. The groundborne vibration monitoring program shall measure (in vertical and horizontal directions) and continuously store the peak particle velocity (PPV) in inch/second. Groundborne vibration data shall be stored on a two-second interval. The program shall also be programmed for two preset velocity levels: a warning level of 0.15 inch/second PPV and a regulatory level of 0.2 inch/second PPV. The program shall also provide real-time alerts when the groundborne vibration levels exceed the two preset levels. Monitoring shall be conducted at feasible locations between the Project Site and the residential buildings along Vista del Mar Avenue adjacent to the Project Site as near to the adjacent residential structures as possible.

- The groundborne vibration monitoring program shall be submitted to the Department of Building and Safety, prior to initiating any construction activities for approval.
- In the event the warning level (0.15 inch/second PPV) is triggered, the contractor shall identify the source of groundborne vibration generation and provide feasible steps to reduce the groundborne vibration level such as halting/staggering concurrent activities or utilizing lower vibratory techniques.
- In the event the regulatory level (0.2 inch/second PPV) is triggered, the contractor shall halt the construction activities in the vicinity of the affected residences and visually inspect the affected residences for any damage. Results of the inspection must be logged. The contractor shall identify the source of groundborne vibration generation and implement feasible steps to reduce the groundborne vibration level such as staggering concurrent activities or utilizing lower vibratory techniques. Construction activities may continue upon implementation of feasible steps to reduce the groundborne vibration level.
- In the event damage occurs to the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) due to Project construction groundborne vibration, such materials shall be repaired to the same or better physical condition as documented in the pre-construction inspection and video and/or photographic records. Any such repair work shall be conducted in accordance with the Secretary of Interior's Standards for Rehabilitation pursuant to CEQA Guidelines Section 15064.5, subsection (b)(3).

¹ See Final EIR, Appendix C-1, at page 7.

3. Page IV.I-61, revise the first and second paragraph on the page as follows:

Implementation of MM-NOI-3 would ensure that construction groundborne vibration levels would be below the significance threshold of 0.2 inches per second (PPV) for potential structural damage impacts at the nearest single-family residential building adjacent to the site along Vista Del Mar Avenue (R3). This mitigation measure requires a 15-foot buffer between the nearest residential building and heavy construction equipment operations. At 15 feet, the groundborne vibration levels would be reduced to 0.191 inches per second (PPV). The mitigated level of 0.191 inches per second (PPV) is less than, but still close to the significance threshold of 0.2 inches per second (PPV). Therefore, MM-NOI-4 is also recommended to mitigate potential groundborne vibration impacts. Implementation of MM-NOI-4 would ensure that groundborne vibration levels are below the thresholds associated with potential damage to the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) due to Project construction. ~~However, because MM-NOI-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable.~~ In addition, temporary construction-related groundborne vibration and groundborne noise impacts on human annoyance would be reduced at the adjacent residential uses along the west side Vista Del Mar Avenue (represented by measurement location/sensitive receptor location R3). However, given that the groundborne vibration level would be close to but still under the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures. **Therefore, temporary construction related groundborne vibration structural impacts would be less than significant with mitigation but temporary groundborne vibration and noise human annoyance impacts would be significant and unavoidable.**

Section IV. L, Transportation

1. Pages IV.L-42 and IV.L-42, revise MM-TRAF-1 as follows:

MM-TRAF-1: Transportation Demand Management Program. The Project Applicant shall prepare and implement a comprehensive Transportation Demand Management (TDM) Program to promote non-auto travel and reduce the use of single-occupant vehicle trips. A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the Project. ~~The TDM Program shall be subject to review and approval by the Department of City Planning and LADOT. A covenant and agreement shall be implemented to ensure that the TDM Program shall be maintained. The exact measures to be implemented shall be determined when the Program is prepared, prior to issuance of a final certificate of occupancy for the Project.~~ The TDM Program shall ensure that the Project VMT would be below the applicable VMT threshold(s) established in the Transportation Assessment Guidelines through such means that could include monitoring or reporting, as required by the City. The strategies in the TDM Program shall include at a minimum, the following:

- Unbundled Parking: Provision of unbundled parking for residents (i.e., parking space is leased separately from dwelling units); and
- Promotions and Marketing: Employees and residents shall be provided with materials and promotions encouraging use of alternative modes of transportation. This type of campaign would raise awareness of the options available to people who may never consider any alternatives to driving.

In addition, the TDM could include measures such as:

- ~~Short-term car rentals;~~
- ~~Incentives for using alternative travel modes (such as transit passes);~~
- ~~Guaranteed ride home program for employees;~~
- ~~Parking incentives and administrative support for formation of carpools/vanpools; and/or~~
- Provide an internal Transportation Management Coordination Program with an on-site transportation coordinator;
- Design the project to ensure a bicycle, transit, and pedestrian friendly environment;
- Accommodate flexible/alternative work schedules and telecommuting programs;
- A provision requiring compliance with the State Parking Cash-out Law in all leases;
- Coordinate with DOT to determine if the project location is eligible for a future Integrated Mobility Hub (which can include space for a bike share kiosk, and/or parking spaces on-site for car-share vehicles);
- Provide on-site transit routing and schedule information;
- Provide a program to discount transit passes for residents/employees possibly through negotiated bulk purchasing of passes with transit providers;
- Provide rideshare matching services;
- Preferential rideshare loading/unloading or parking location;
- Contribute a one-time fixed fee contribution of \$75,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the vicinity of the Project; and/or
- Participation as a member in the future Hollywood Transportation Management Organization (TMO), when operational. When the Hollywood TMO becomes operational, the Hollywood TMO's services may replace some of the in-house TDM services where applicable.

In addition to these TDM measures, DOT also recommends that the applicant explore the implementation of an on-demand van, shuttle or tram service that connects the project employees to off-site transit stops (such as the Metro Red Line stations) based on the transportation needs of the project's employees. Such a service can be included as an additional measure in the TDM program if it is deemed feasible and effective by the applicant.

Chapter V, Alternatives

1. Page V-20, revise first paragraph as follows:

In addition, implementation of Mitigation Measure NOI-3 and Mitigation Measure MM-NOISE-4 would serve to minimize and reduce construction groundborne vibration levels to below the structural damage threshold level. ~~However, because MM-NOISE-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable.~~ Although temporary, construction-related groundborne vibration and groundborne noise impacts on human annoyance would also be reduced, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures. Because the No Project/No Build Alternative would not involve any construction activity, and would avoid the Project's significant and unavoidable construction noise and vibration impacts, construction noise and vibration impacts would be less than under the Project.

2. Page V-43, revise first full paragraph as follows:

In addition, implementation of Mitigation Measure NOI-3 and Mitigation Measure MM-NOISE-4 would serve to minimize and reduce construction groundborne vibration levels to below the structural damage threshold level. ~~However, under the Project or Alternative 2, because MM-NOISE-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable.~~ Although temporary, construction-related groundborne vibration and groundborne noise impacts on human annoyance would also be reduced, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures under both the Project and Alternative 4. The Project and Alternative 2 would have a similar building floor area and size and, as such, both the Project and Alternative 2 would result in significant and unavoidable construction noise and vibration impacts. However, Alternative 2 would reduce the Project's automobile parking space in Building 1 by approximately 16 percent and bicycle parking space by approximately 37 percent and, as such, reduce the extent of excavation required for the Project's parking levels. Therefore, the duration of impacts related to high noise and vibration levels during the excavation phase would be less than under the Project.

3. Page V-68 and 69, revise the following paragraph as follows:

In addition, implementation of Mitigation Measure NOI-3 and Mitigation Measure MM-NOISE-4 would serve to minimize and reduce construction groundborne vibration levels to below the structural damage threshold level. ~~However, under the Project or Alternative 4, because MM-~~

~~NOISE-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable.~~ Although temporary, construction-related groundborne vibration and groundborne noise impacts on human annoyance would also be reduced, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures under both the Project and Alternative 4. However, because the scale of excavation and the use of heavy equipment would be less under Alternative 3, and occur within a shorter time frame, noise and vibration impacts would be less than under the Project.

4. Page V-92, revise second full paragraph as follows:

In addition, implementation of Mitigation Measure NOI-3 and Mitigation Measure MM-NOISE-4 would serve to minimize and reduce construction groundborne vibration levels to below the structural damage threshold level. ~~However, under the Project or Alternative 4, because MM NOISE-4 requires the consent of other property owners, who may not agree, it is conservatively concluded that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable.~~ Although temporary, construction-related groundborne vibration and groundborne noise impacts on human annoyance would also be reduced, given that the groundborne vibration level would be close to the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures under both the Project and Alternative 4. Construction activities under either the Project or Alternative 4 would result in significant and unavoidable noise and vibration impacts. However, because the scale of excavation and the use of heavy equipment would be less under Alternative 4, and occur within a shorter time frame, noise impacts would be less than under the Project.

5. Page V-108, revise the impact comparisons regarding noise and vibration in Table V-13, Comparison of Impacts Associated with the Alternatives and the Project, as follows:

	Proposed Project	Alternative 1 No Project /No Build	Alternative 2 Primarily Residential Mixed-Use	Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus	Alternative 4 Primarily Office Mixed-Use
Construction Noise and Vibration	Significant and unavoidable (<u>human annoyance</u>)	Less (No Impact)	Less (Significant and unavoidable, <u>human annoyance</u>)	Less (Significant and unavoidable, <u>human annoyance</u>)	Less (Significant and unavoidable, <u>human annoyance</u>)

6. Page V-108, revise the impact comparisons regarding parks and recreation in Table V-13, Comparison of Impacts Associated with the Alternatives and the Project, as follows:

	Proposed Project	Alternative 1 No Project /No Build	Alternative 2 Primarily Residential Mixed-Use	Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus	Alternative 4 Primarily Office Mixed-Use
Parks and Recreation	Less Than Significant with Mitigation	Less (No Impact)	Greater (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)

7. Page V-109, revise the impact comparison for Alternative 2 regarding solid waste in Table V-13, Comparison of Impacts Associated with the Alternatives and the Project, as follows:

	Proposed Project	Alternative 1 No Project /No Build	Alternative 2 Primarily Residential Mixed-Use	Alternative 3 No Commercial Zone Change, No High Density Residential, No Density Bonus	Alternative 4 Primarily Office Mixed-Use
Solid Waste	Less Than Significant	Less (No Impact)	Less <u>Greater</u> (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

Chapter VI, Other CEQA Considerations

1. Page VI-2, revise following paragraphs as follows:

Construction Groundborne Vibration/Noise. Implementation of MM-NOI-3 ~~would ensure that construction groundborne vibration levels would be below the significance threshold of 0.2 inches per second (PPV) for potential structural damage impacts at the nearest single-family residential building adjacent to the site along Vista Del Mar Avenue (R3). This mitigation measure requires a 15-foot buffer between the nearest residential building and heavy construction equipment operations. At 15 feet, the groundborne vibration levels would be reduced to 0.191 inches per second (PPV). The mitigated level of 0.191 inches per second (PPV) is less than, but still close to the significance threshold of 0.2 inches per second (PPV). Therefore, MM-NOI-4 is also recommended~~ implemented to mitigate potential groundborne vibration impacts, which calls for the implementation of a groundborne vibration monitoring program. ~~Implementation of MM-NOI-4 would ensure that groundborne vibration levels are below the thresholds associated with potential damage to the residential buildings along Vista Del Mar Avenue (measurement location/sensitive receptor location R3) due to Project construction. However because MM-NOI-4 requires the consent of other property owners, who may not agree, it is conservatively concluded~~

~~that structural groundborne vibration impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable.~~

~~In addition, t~~Temporary construction-related groundborne vibration and groundborne noise impacts on human annoyance would be reduced at the adjacent residential uses along the west side Vista Del Mar Avenue with implementation of Mitigation Measures MM-NOI-3 and MM-NOI-4 (represented by measurement location/sensitive receptor location R3). However, given that the groundborne vibration level would be close to but still under the structural damage threshold, it would still exceed the perceptibility threshold at groundborne vibration-sensitive uses. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures. Therefore, temporary construction-related groundborne vibration ~~structural and groundborne vibration and noise~~ human annoyance impacts would be significant and unavoidable.

Appendix D-1: Historic Resources Assessment

1. Page 57, revised 1st full paragraph as follows:

2. Historical Resources Identified within the Project Site

For the purposes of the analysis in this Historic Resources Assessment Report, 6210-6218 and 6220-6224 Yucca Street and 1756-1760 North Argyle Avenue (Yucca Argyle Apartments), 1771 and 1765 North Vista del Mar Avenue (contributors to the Vista del Mar/Carlos Historic District) were re-evaluated, ~~pursuant to PRC, Article 2, Section 5024.1(g)(4), which provides for the update of survey and re-evaluation of historical resources after five years to account for changed circumstances or further documentation.~~ to determine whether their proposed demolition as part of the original Project would result in a substantial adverse change to the Vista del Mar/Carlos Historic District. The current architectural description is provided above (III.4. through III.6) and significance evaluation is included below (IV.B.)

3. Modified Alternative 2

a) Modified Alternative 2 Overview

The Modified Alternative 2 would incorporate all of the Project's Project Design Features and implements all of the Mitigation Measures identified for the Project, and would include all of the Project's features and characteristics, except as described in this Subsection 3. The Modified Alternative 2 proposes to eliminate the Project's hotel uses (136 rooms) and to build residential uses and ground level commercial/restaurant space only. The Modified Alternative 2 would be similar in use to Alternative 2, the "Primarily Residential-Mixed Use Alternative," evaluated in the Draft EIR. The Modified Alternative 2 would partially or fully meet the Project Objectives in a similar manner to Alternative 2, as presented in Table V-14 of Chapter V, Alternatives, of the Draft EIR.

The Modified Alternative 2, as with Alternative 2, would increase the Project's number of total residential units from 210 to 271 units, inclusive of 17 units of covenanted affordable housing at

the Very Low Income level. The Project's 3-story, 13-unit Building 2 proposed along Vista Del Mar Avenue (within the East Parcels) would not be constructed under the Modified Alternative 2. The height of the proposed tower (Building 1) would increase from 20 to 30 stories. The two existing residential properties and associated buildings (1765 and 1771 Vista Del Mar Avenue) would remain in place. The residence at 1771 Vista Del Mar Avenue would remain as a single-family use and the residence at 1765 Vista Del Mar Avenue, which had previously been converted from a single-family residence to a duplex with an additional unit over the garage, would be converted to a single-family home.

The Modified Alternative 2 would decrease the Project's commercial floor area from 12,570 square feet to 7,760 square feet, with 1,540 square feet of commercial/restaurant space at the northwest corner of Yucca Street and Argyle Avenue, within Level 1 and 6,220 square feet of commercial space along the Yucca Street frontage.

The Modified Alternative 2 would increase the Project's open space from 24,350 square feet to 30,400 square feet. The open space would include a 2,820-square-foot publicly-accessible park at the corner of Vista Del Mar Avenue and Yucca Street. The park would replace the existing fenced and paved parking lot currently occupying that location and would be available for use by the surrounding neighborhood.

Parking facilities under the Modified Alternative 2 would be accessed via a single driveway on Argyle Avenue, thus, eliminating the driveways along on Yucca Street and Vista del Mar Avenue proposed by the Project.

b) Comparison of the Project, Alternative 2, and Modified Alternative 2

The Modified Alternative 2 is compared to the Project and Alternative 2 in **Table 3-1, Comparison of the Project, Alternative 2, and Modified Alternative 2**, below. The comparison applies primarily to Building 1 since Building 2 would not be constructed under the Modified Alternative 2. With the incorporation of the two single-family residences on Vista Del Mar, the Modified Alternative 2's total residential units would be 271, as with Alternative 2.

**TABLE 3-1
COMPARISON OF PROJECT, ALTERNATIVE 2 AND MODIFIED ALTERNATIVE 2**

Use	Draft EIR Project	Draft EIR Alternative 2 Primarily Residential Mixed-Use	Modified Alternative 2
Max. Height	Bldg. 1: 20 stories (225') [a] Bldg. 2: 3 stories (34' or 47') [b, c]	Bldg. 1: 20 stories (225') [a] Bldg. 2: 3 stories (34' or 47') [b, c]	Bldg. 1: 30 stories (348') [a] No Bldg. 2
Residential	Building 1: 197 units Building 2: 13 units Total: 210 units	Building 1: 254 units Building 2: 17 units Total: 271 units	Building 1: 269 units 2 existing units Total: 271 units

**TABLE 3-1
COMPARISON OF PROJECT, ALTERNATIVE 2 AND MODIFIED ALTERNATIVE 2**

Use	Draft EIR Project	Draft EIR Alternative 2 Primarily Residential Mixed-Use	Modified Alternative 2
Studio:	0 units	21 units	21 units
1 Bedroom:	104 units	126 units	128 units
2 Bedroom:	96 units	108 units	110 units
Suite:	10 units	12 units	10 units
Very Low Income Units:	0	0	17
Commercial/ Restaurant (sq. ft.)	Building 1: 12,570 sf	Building 1: 5,120 sf.	Building 1: 7,760 sf
Hotel (Rooms)	Building 1: 136 rooms	No hotel uses	No hotel uses
Open Space	24,350 sf	34,740 sf	30,400 sf
Code-Required Automobile Parking	Building 1: 471 spaces [d] Building 2: 23 spaces	Building 1: 386 spaces [d] Building 2: 21 spaces	Building 1: 414 spaces [d]
Code-Required Bicycle Parking	Building 1: 243 spaces Building 2: 19 spaces	Building 1: 157 spaces Building 2: 19 spaces	Building 1: 164 spaces
Floor Area	Building 1: 300,603 sq. ft. Building 2: 16,345 sf Total: 316,948 sf	Building 1: 300,603 sf Building 2: 16,345 sf Total: 316,948 sf	Building 1: 312,246 sf Existing to remain: 4,702 sf Total: 316,948 sf
FAR	Averaged over Site: 6.6: 1	Averaged over Site: 6.6:1	Averaged over Site: 6.6:1
Remove all existing on-site uses?	Yes	Yes	No (Existing residences on Vista Del Mar to remain)

[a] Building height relative to the lowest elevation of the adjacent Argyle Avenue

[b] Building height relative to the elevation of the adjacent Yucca Street

[c] Building height relative to the lowest elevation along adjacent Vista Del Mar Avenue

[d] Does not include allowed reductions for TPA and provision of bicycle parking.

[e] Data not provided for the existing parking spaces or floor area

SOURCE: ESA, 2020.

c) Modified Alternative 2 Details

(1) Floor Area and Building Height

The Modified Alternative 2's single building would provide 312,246 square feet of new floor area. Because the existing on-site residences along Vista Del Mar contain 4,702 square feet of existing floor area, the total Modified Alternative 2 floor area would total 316,948 square feet, the same as the Project. As with the Project, the anticipated Floor Area Ratio (FAR) would be 6.6:1. The new

building would provide a total of 269 residential units. The building would be developed with a narrower east/west profile than the Project's Building 1, and would increase the building height from 20 stories, 255 feet under the Project to 30 stories, 348 feet to the top of the parapet under the Modified Alternative 2. Building heights pursuant to City code are measured from the low finished grade of the property to the top of the parapet.

The high-rise component would rise above the five-story parking podium, which would be partially lined by ground-level retail/restaurant uses and otherwise screened in accordance with City design requirements. The Modified Alternative 2 would have an east/west dimension of approximately 180 feet. By comparison, the east/west dimension of the Project's 20-story tower would be approximately 257 feet. The north/south dimension of the high-rise component would be 80 feet, similar to the Project. **Figure 3-1, Conceptual Site Plan – Modified Alternative 2**, shows the dimensions and setbacks of Building 1. It also shows the location of the two residential properties on the East Parcels that would be single-family dwellings.

Residential uses would occupy Levels 6 through Level 29 of the new building. Approximately 14,720-square-feet of open space, including a swimming pool, seating and landscaping would be provided at the top of the 5-level podium at Level 6. **Figure 3-2, Level 6 Plan – Modified Alternative 2**, illustrates the first residential floor and the standard layout of residential units, as well as the podium open space.

The top level of the new building, Level 30, would provide a 6,260-square-foot roof garden and swimming pool area. This level is illustrated in **Figure 3-3, Level 30 Plan – Modified Alternative 2**.

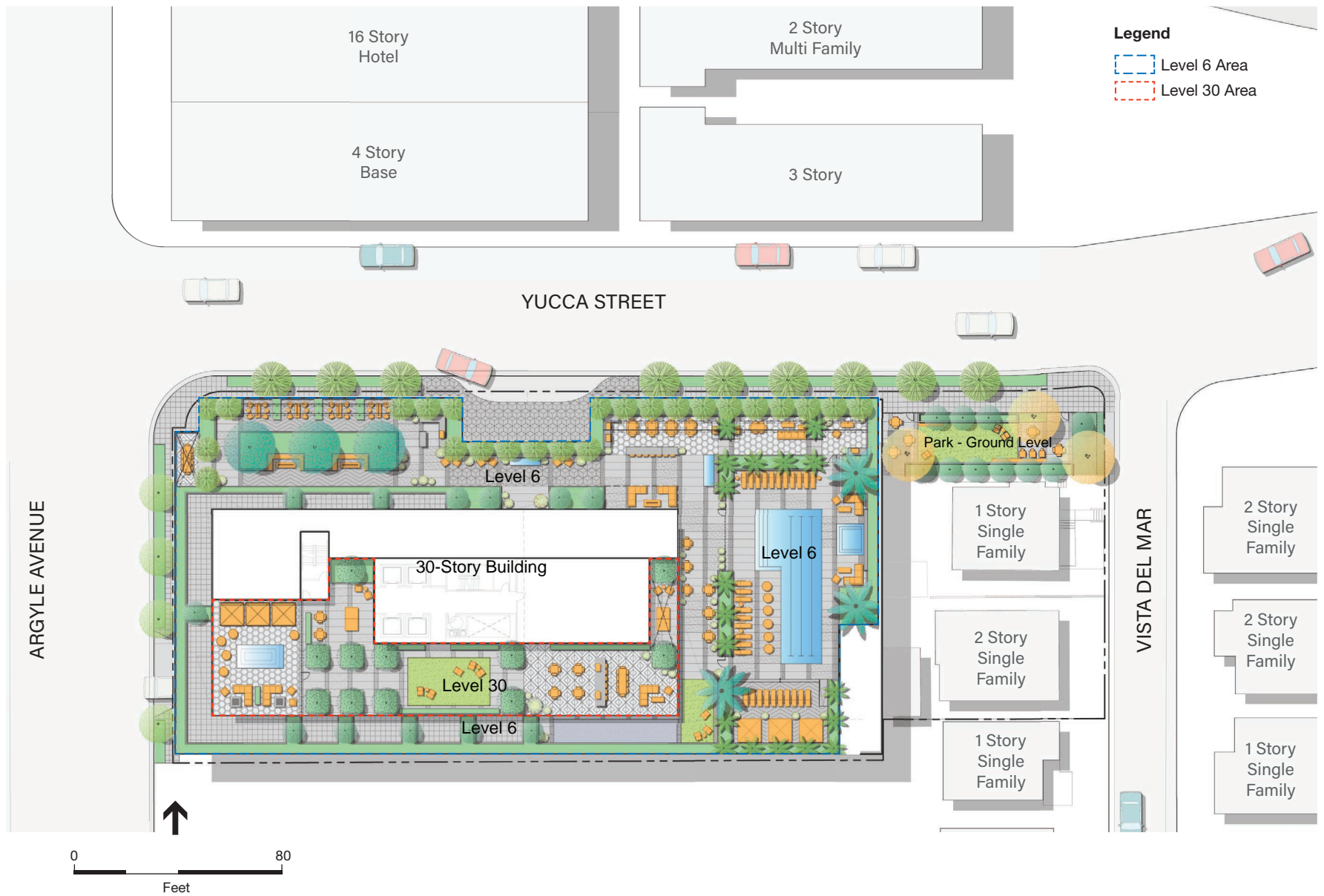
Commercial/restaurant uses (7,760 square feet) would be located along the Yucca Street frontage at Level 2 and at the corner of Yucca Street and Argyle Avenue in Level 1, and would be accessible from the street level at that point.

(2) Automobile and Bicycle Parking

Regarding vehicle parking, the Modified Alternative 2 proposes to provide a total of 414 spaces within a five-level Parking Podium, one partially below-grade parking level (Level 1) and one fully below grade level (P1). The Modified Alternative 2 would also provide a total of 164 bicycle parking stalls, 18 short-term and 147 long-term, with 36 bicycle stalls on Level 1 and 128 bicycle stalls on Level 2. Parking facilities would be accessed via a single driveway on Argyle Avenue. Los Angeles Municipal Code ("LAMC") required parking for the Modified Alternative 2 is summarized in **Table 3-2, Modified Alternative 2 Code-Required Automobile Parking**, and **Table 3-3, Modified Alternative 2 Code-Required Bicycle Parking**, below.

(3) Building Setbacks and Sidewalks

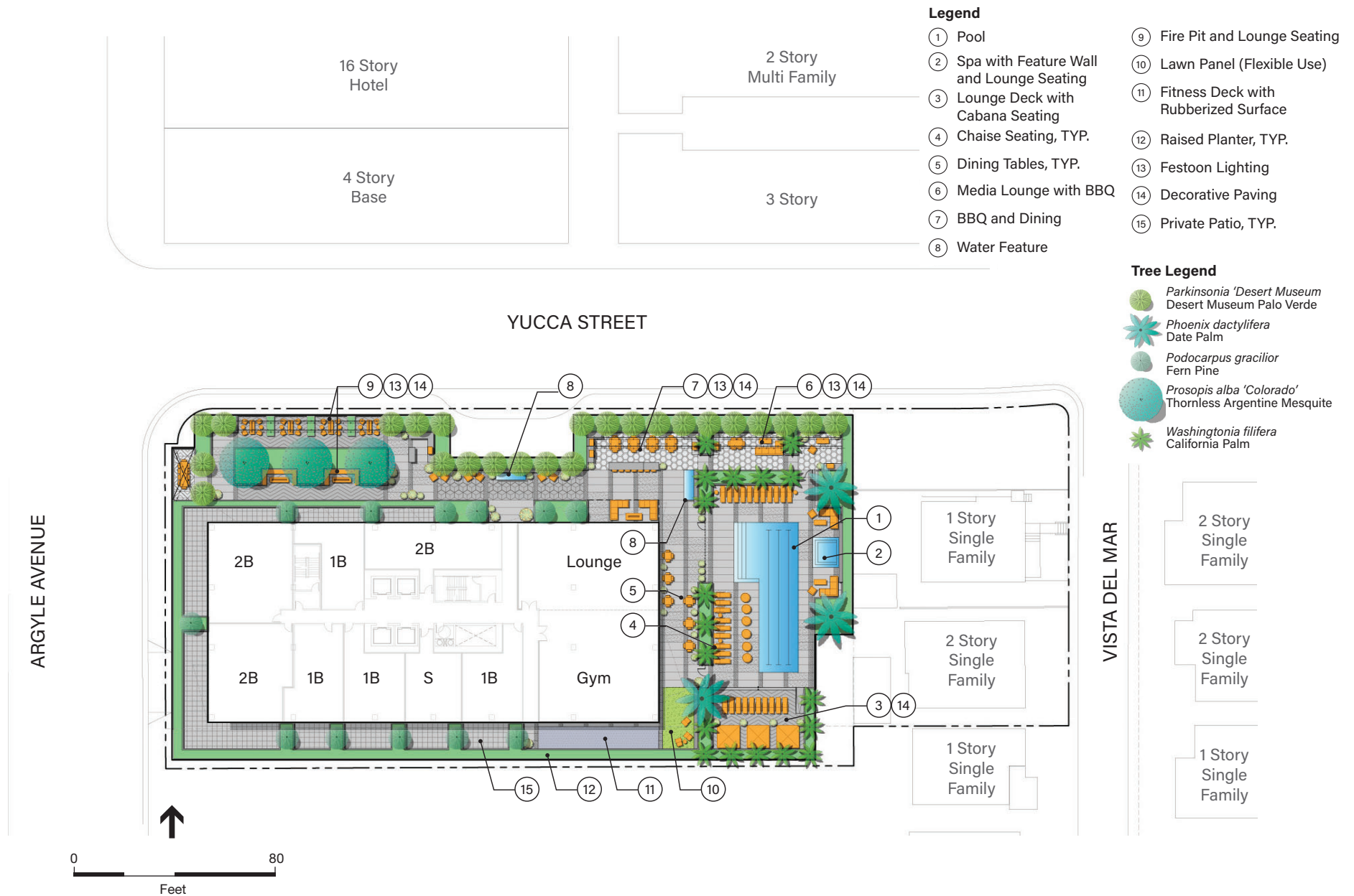
Similar to the Project, the Modified Alternative 2 would have a 16-foot side yard setback along its southern edge. The Modified Alternative 2's high-rise component would be set back from the Vista Del Mar residential property (East Parcels) by approximately 77 feet and from Vista Del Mar Avenue by approximately 162 feet. It would be set back from the Argyle Avenue sidewalk by 17 feet (similar to the Project) and from Yucca Street by approximately 52 feet (similar to the Project).



SOURCE: Togawa Smith Martin, Inc. 2020

6220 West Yucca Project

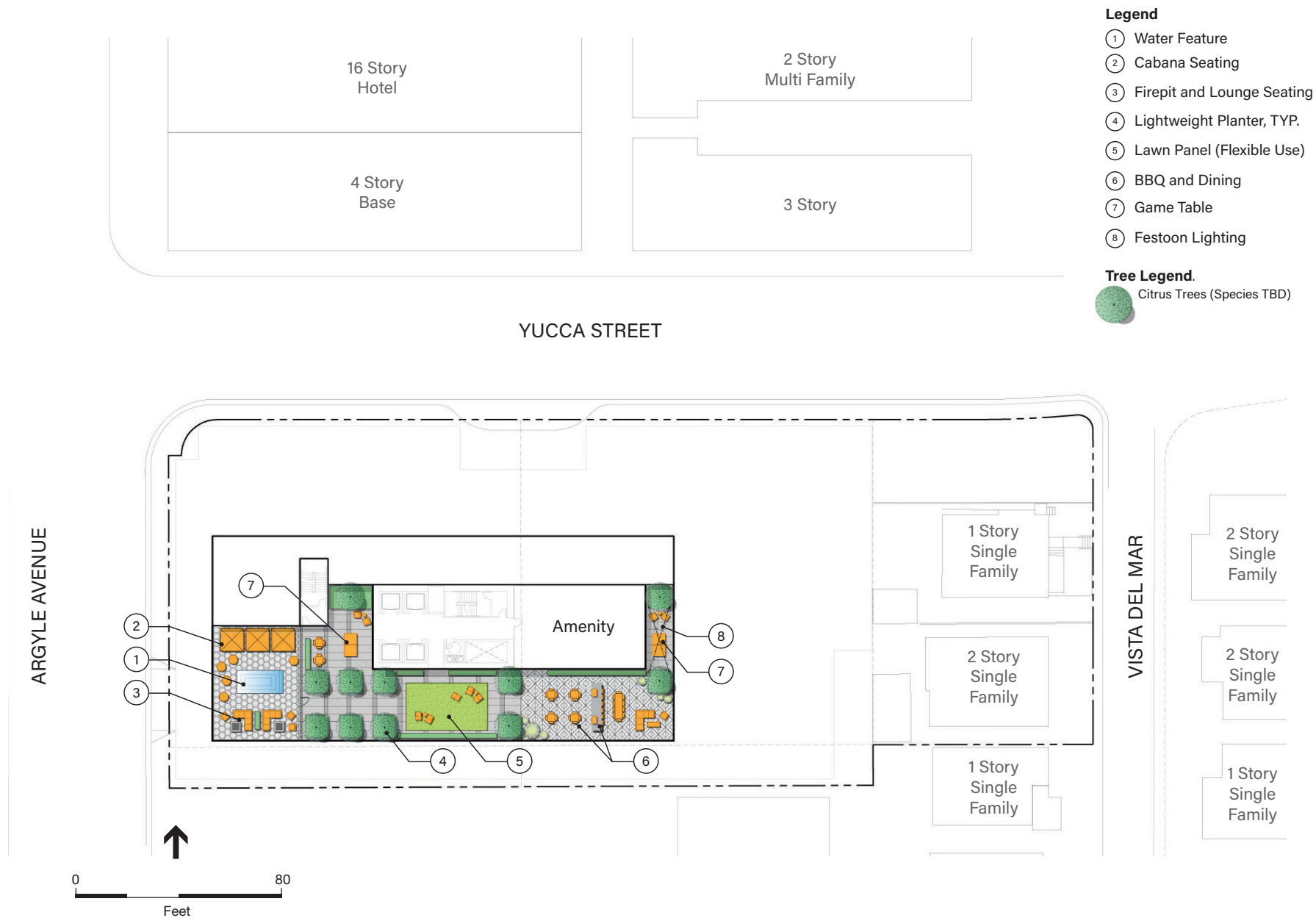
Figure 3-1
Conceptual Site Plan – Modified Alternative 2



SOURCE: Togawa Smith Martin, Inc. 2020

6220 West Yucca Project

Figure 3-2
Level 6 Plan – Modified Alternative 2



SOURCE: Togawa Smith Martin, Inc. 2020

6220 West Yucca Project

Figure 3-3
Level 30 Plan – Modified Alternative 2

**TABLE 3-2
MODIFIED ALTERNATIVE 2 CODE-REQUIRED AUTOMOBILE PARKING**

Unit Type	Factor [a]	Number of Units or Floor Area	Parking
Studio	1 space per unit	22	22 spaces
One-bedroom	1 space per unit	128	128 spaces
Two-bedroom	2 spaces per unit	110	220 spaces
Suite (2-bedroom)	2 spaces per unit	10	20 spaces
Commercial Parking	1 space/500 sf	7,760 sf	16 spaces
Required Total:			405 spaces
Total Provided Parking:			414 spaces

[a] Per LAMC Sec. 12.21.A.4

Source: ESA, 2020

**TABLE 3-3
MODIFIED ALTERNATIVE 2 CODE-REQUIRED BICYCLE PARKING**

Land Use	Long-Term Factor [a]	Number of Units or Floor Area	Short-Term Factor	Number of Units or Floor Area	Total spaces
Up to 25 units	1 space per unit	25	1 space per 10 units	25	27 spaces
26-100 units	1 space per 1.5 units	75	1 space per 15 units	75	55 spaces
101-200 units	1 space per 2 units	100	1 space per 20 units	100	55 spaces
200+	1 space per 4 units	71	1 space per 40 units	71	18 spaces
Commercial	1 space per 2,000 sf	8,860	1 space per 2,000 sf	8,860	8 spaces
Required Total		17		2	165 spaces
					(18 short-term)
					(147 Long-Term)
Parking Provided					165 spaces

Source: ESA, 2020

Along Argyle Avenue, as with the Project, along Argyle, the Modified Alternative 2 would reduce the existing sidewalk width from approximately 12 feet to approximately 9.5 feet. As with the Project, the proposed narrowed sidewalk would not cause pedestrian capacity constraints on Argyle Avenue. As with the Project, sidewalk widths under the Modified Alternative 2 would vary along Yucca Street adjacent to the proposed building, with widths ranging from approximately

8.33 feet to 14-feet. Adjacent to the park, the sidewalk width would approximately 5.83 feet and 3.83 feet along Vista Del Mar Avenue, while the existing sidewalks along Vista del Mar Avenue adjacent to the Project Site would remain as-is.

(4) Building Design

As discussed above, the Modified Alternative 2 would increase the Project's high-rise component from 20 stories to 30 stories. However, the building dimensions would be reduced to approximately 80 feet x 180 feet compared to the Project's high-rise component's dimension of 80 feet by approximately 257 feet. The reduction would occur along the east/west axis, thus reducing the high-rise profile as viewed from the north from Yucca Street and from the south. This reduction would also allow for a greater setback of the high-rise component from Vista Del Mar Avenue. The profile of the high-rise component is illustrated in **Figure 3-4, East/West Building Section – Modified Alternative 2**, and in **Figure 3-5, North Elevation – Modified Alternative 2**.

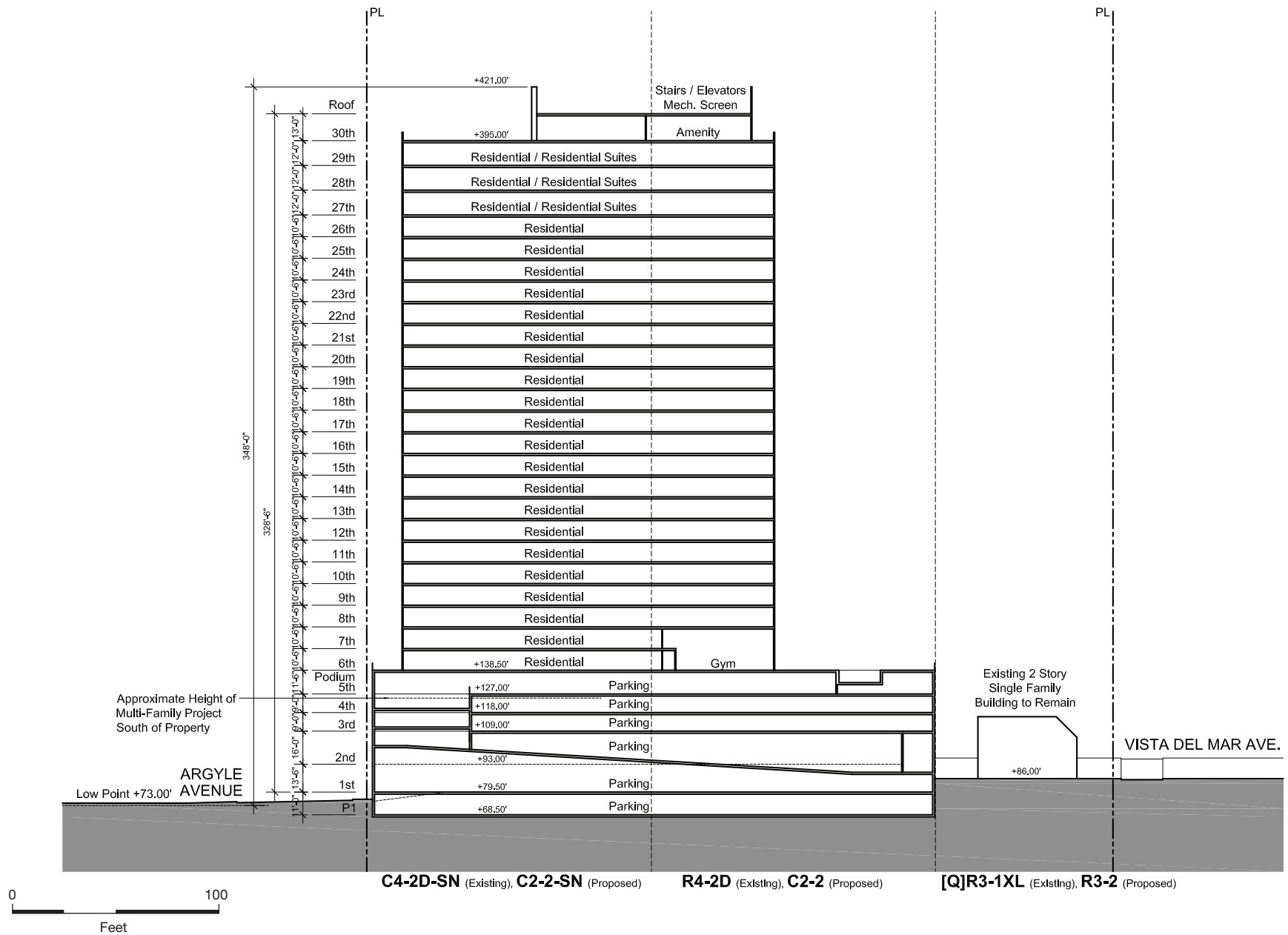
Similar to the Project, the exterior boundaries of the Project Site under the Modified Alternative 2 along Yucca Street, Argyle Avenue, and Vista Del Mar Avenue would include a streetscape design allowing for pedestrians, potential café tables, parkway planters, and bike parking. All of the open space areas would provide landscaping and detailed hardscape. Street trees would be planted along Yucca Street and Argyle Avenue, and trees would be planted the park in the western portion of the Project Site. The Modified Alternative 2 would plant 76, 24-inch box minimum trees, in excess of the 68 trees required under the LAMC.

Project features with respect to lighting and signage, site security and sustainability would be similar to the Project. The conceptual design of Building 1 is modern, featuring a mix of glass and solid panel clad exterior walls for the residential components and the parking podium. Building 1 would have two massing components. The lower section with the 5-story parking structure is clad in solid panels and it would act as a strong base for the glass-clad tower.

The base would have tinted windows in addition to solid panels. Tinted glass would be used for the tower component's exterior windows. A combination of balcony-cutouts and overhangs on the all-glass tower component would create patterns that ripple across the building's facades.

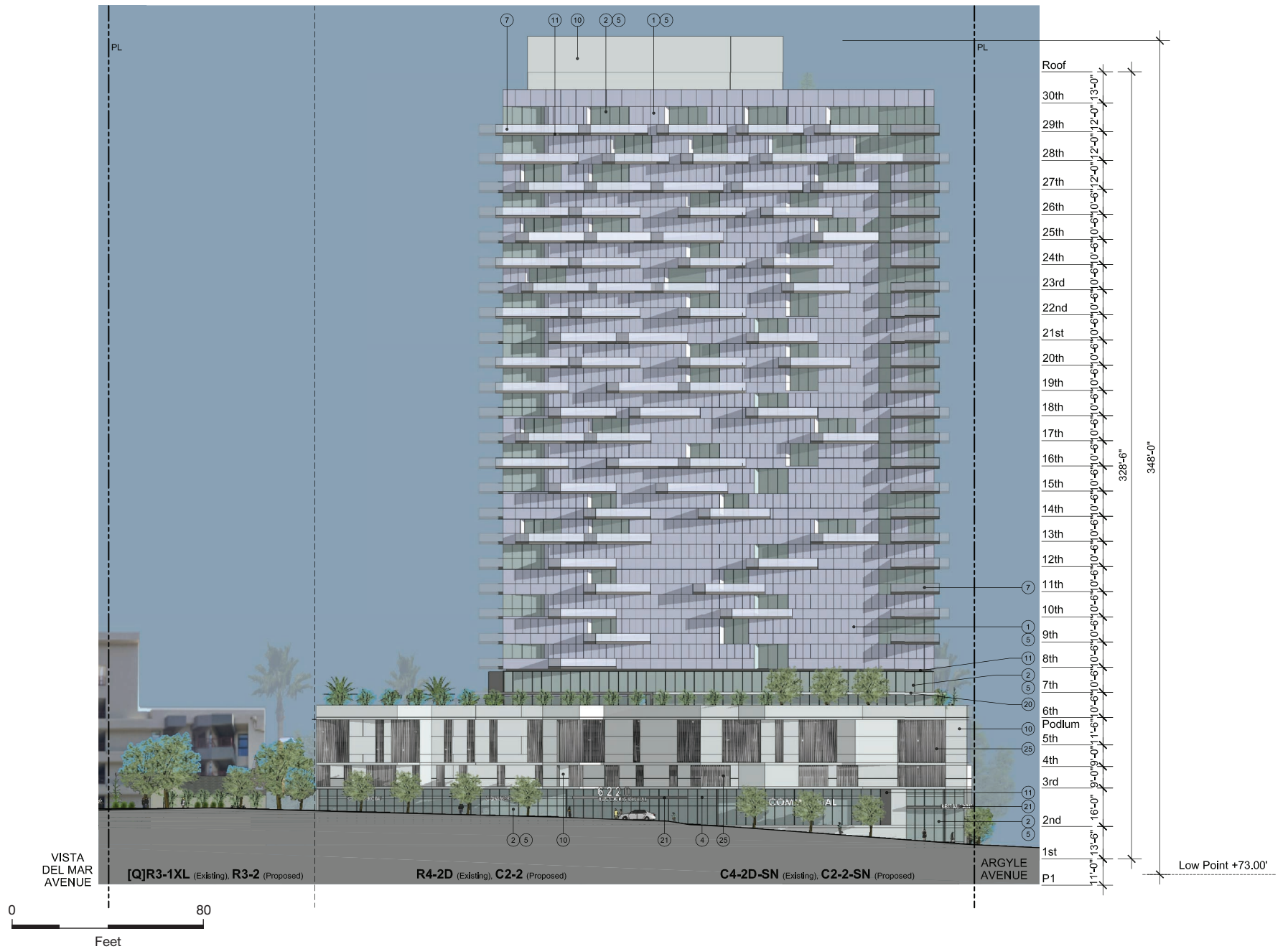
Loading, recycling, trash removal, and collection for the residential and commercial/restaurant uses would occur in designated areas within the interior areas of Level 1 such that noise, odor, or other impacts to nearby residents would be minimized.

The full plan set for the Modified Alternative 2, including renderings, elevations, floor plans, and landscape plans are contained in this Final EIR as Appendix B.



SOURCE: Togawa Smith Martin, Inc. 2020

6220 West Yucca Project
Figure 3-4
 East/West Building Section – Modified Alternative 2



SOURCE: Togawa Smith Martin, Inc. 2020

6220 West Yucca Project
Figure 3-5
 North Elevation – Modified Alternative 2

(5) Rent Stabilized and Very Low Income Units

The Modified Alternative 2 would replace the Project Site's existing RSO residential units. Currently, the site has 43 units (all units except the single-family residence) that are subject to the City's RSO. The RSO includes local regulations that implement the Ellis Act, a State law that regulates the transition of certain rental units to other uses. Under the RSO, project applicants are required to provide relocation assistance to any existing tenants of RSO units that are replaced. For such tenants, applicants are required to provide relocation assistance in the form of a specified monetary payment set by the City to assist with relocation expenses. In compliance with these requirements, existing tenants on the Project Site would be provided relocation assistance as required by the RSO. The RSO also imposes replacement unit requirements where RSO units are replaced. To comply with these requirements, the Modified Alternative 2 would provide 252 RSO units, thus, there would be a net increase of 209 RSO units compared to existing conditions. Also, the Modified Alternative 2 would include 17 Very Low Income affordable units in the new building, which would not be RSO units, for a total of 269 units in Building 1.

(6) Required Approvals

The Modified Alternative 2 would require similar approvals to those of the Project. The Modified Alternative 2 would not include a hotel or require a Conditional Use to permit a hotel. In addition, because it would provide for Very Low Income residences, the Modified Alternative 2 would require a Density Bonus pursuant to the City's Density Bonus ordinance.

- The requested Conditional Use to permit a hotel per LAMC Section 12.24-W.24 would not be required.
- The required Conditional Use Permit: For a Major Development Project per LAMC Section 12.24-U.14 would not be required.
- The Modified Alternative 2 would provide 17 Very Low Income residential units, representing 8 percent of the Project Site's applicable base density. Pursuant to LAMC Section 12.22-A.25(e), in addition to a 27.5 percent density increase (212 to 271 units), the Modified Alternative 2 requests the following incentive:
 - A floor area bonus (10 percent from 6:1 FAR base) to allow additional floor area up to 6.6:1 FAR (an up to 27.5% FAR bonus is available per the LAMC).

Other necessary approvals would be the same as under the Project and would include the following:

- Zone Change and Height District Change: The West Parcel is currently zoned C4-2D-SN, the Center Parcel is currently zoned R4-2D, and the East Parcels are currently zoned [Q]R3-1XL. The Modified Alternative 2 would require a zone change and a height district change for the Center Parcel from R4-2D to C2-2D, a zone change and height district change for the West Parcel from C4-2D-SN to C2-2D-SN) and a zone change for removal of the "[Q]" and a height district change for the East Parcels from [Q]R3-1XL to R3-2D pursuant to LAMC Section 12.32 in order to allow development of the Modified Alternative 2.
- Site Plan Review: The Modified Alternative 2 would create, or result in an increase of, 50 or more dwelling units. As such, it would require Site Plan Review pursuant to LAMC Section 16.05.

- Master Conditional Use Permit: Alcoholic Beverages and Live Entertainment/Dancing: The Modified Alternative 2 would include the sale of a full line of alcoholic beverages and live entertainment / dancing in connection with its restaurant portions. Thus, the Modified Alternative 2 would require a CUP pursuant to LAMC Section 12.24.W.1 and W.18.
- Concurrent consideration under the Multiple Approvals Ordinance of all entitlement requests per LAMC Section 12.36.
- Vesting Tentative Tract Map per LAMC Section 17.15.
- Haul Route Permit, as may be required.
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including but not limited to temporary street closure permits, waivers of dedication requirements, demolition permits, grading permits, excavation permits, foundation permits, and building permits.

(7) Construction Grading and Schedule

With regard to construction activities and schedule, it is anticipated that the overall duration of construction (approximately 2 years) would be similar to the Project due to a similar amount demolition and site preparation, as well as overall construction floor area. However, the Modified Alternative 2 would have one subterranean parking level and one partially subterranean parking level under the new building, reducing the total amount of excavation as compare to the Project, which included two full subterranean and two partial subterranean levels of parking. Also, with the elimination of Building 2 the excavation of the subterranean parking structure for Building 2 would not be required. Demolition debris would also be reduced since the existing residences in the East Parcels would remain in place and would not be demolished. Overall, the amount of soil export required for the Modified Alternative 2 is estimated to be approximately 24,000 cubic yards (cy) of soil, which is substantially less than analysis of export of 120,000 CY of soils analyzed for the Project in the Draft EIR. Excavation depths for the Modified Alternative 2 would be a maximum of approximately 20 feet and approximately 40 feet for footings, slightly less than under the Project.

d) Modified Alternative 2 Environmental Impacts

As discussed above, the Modified Alternative 2 is a modified version of Alternative 2 in the Draft EIR, the Primarily Residential Mixed-Use alternative. Alternative 2 was analyzed in detail in Chapter V, Alternatives, of the Draft EIR, under Subsection 6(b), Alternative 2: Primarily Residential Mixed-Use. As further described on pages V-32 through V-55 and in Table V-13, Comparison of Impacts Associated with the Alternatives and the Project, in Chapter V, Alternatives, of the Draft EIR, Alternative 2 would reduce the Project's less than significant impacts related to construction (less than significant after mitigation) and operation air emissions, archaeological and paleontological resources (less than significant after mitigation), exacerbation of existing geological conditions, unstable geological units, greenhouse gas emissions (GHG), construction hydrology and water quality, operation noise, population/housing, police protection, vehicle miles travelled (VMT) (less than significant after mitigation), water, and wastewater impacts. However, Alternative 2 would increase the Project's less than significant impacts on schools, libraries, parks/recreational facilities (less than significant after mitigation), and solid

waste. Alternative 2 and the other Alternatives would reduce the duration of the Project's significant and unavoidable short-term construction noise and construction groundborne vibration and groundborne noise impacts, but would not reduce these impacts to less than significant levels. (see Table V-13 in Chapter V of the Draft EIR for listing). As addressed below, the Modified Alternative 2 would result in similar reductions in the severity of the Project's already less than significant impacts. The following discussion summarizes, by environmental issue, the nature of the impacts from the Modified Alternative 2, with appropriate references to relevant analysis in the Draft EIR, and in particular the analysis of Alternative 2 in Chapter V, *Alternatives*, of the Draft EIR.

(1) Environmental Impacts

(a) *Aesthetics*

Senate Bill (SB) 743 and Zoning Information File No. 2452 (ZI No. 2452) provide that a mixed-use project in a designated urban TPA site is not required to evaluate aesthetic impacts in an EIR pursuant to CEQA except for potential impacts on cultural and historic resources. Although the Modified Alternative 2 meets this criterion, for informational purposes only with the exception of information related to cultural and historic resources, information based on City thresholds is provided relative to visual quality, views, and light/glare. Information related to cultural and historic resources is also analyzed herein and under Cultural Resources, below.

(i) *Views*

The Modified Alternative 2 would modify the tower building to create a slimmer but taller building in the West Parcels compared to the Project and Alternative 2. Both the Project and Alternative 2 would have the same building height (20 stories and 255 feet) running parallel to Yucca Street. Under the Modified Alternative 2, the building height would be increased to 30 stories and 348 feet to the top of the parapet. Although having a slimmer profile, because no views of scenic resources or panoramic views are available across the existing Project Site, neither the Project nor Alternative 2, nor the Modified Alternative 2 would substantially block panoramic or focal views of scenic resources from parks, scenic overlooks, sidewalks or other areas where viewers can gather to enjoy views. None would block panoramic views that occur in the background of open street corridors (such as views of the Hollywood Sign through north-facing Gower Street). No views of the Capitol Records Building or other scenic resources are available across the Project Site. As with the Project and Alternative 2, the Modified Alternative 2 would be visible from the Jerome D. Daniel Overlook above the Hollywood Bowl and other areas along Mulholland Drive with views across the Los Angeles Basin. Also, as with the Project and Alternative 2, the Modified Alternative 2 would not block views of scenic vistas in the Los Angeles Basin, such views of the downtown Los Angeles high-rise cluster or horizon. Because the Modified Alternative 2, Alternative 2, and the Project are all high-rise buildings and no existing scenic vistas are currently available across the Project Site, impacts would be similar and less than significant under all three development scenarios. Furthermore, this analysis is provided for informational purposes only. The aesthetics impacts of the Project, Alternative 2, and Modified Alternative 2 shall not be considered significant pursuant to SB 743 and ZI No. 2452. Moreover, as with the Project and Alternative 2, views across the Project Site of the Vista Del Mar/Carlos Historic District are blocked

by the existing development on the Project Site. Implementation of the Modified Alternative 2 would thus not have a substantial adverse effect on the existing views across the Project Site to the historic district. Therefore, no views of the Vista del Mar/Carlos Historic District would be altered by the Modified Alternative 2, and no significant aesthetic impacts on views of the District would occur.

(ii) Scenic Resources

The Project Site is not located along, or within the view field of, a state scenic highway and, with the exception of two small street trees along the Project's Argyle Avenue right-of-way (ROW) and three palm trees along the Project's Vista Del Mar ROW does not contain scenic resources such as trees or rock outcroppings. The Project Site is located within and adjacent to the Vista Del Mar/Carlos Historic District. The Modified Alternative 2 would not remove the existing on-site residential buildings, located at 1765 and 1771 N. Vista del Mar Avenue within the Vista Del Mar/Carlos Historic District. While these residences are considered to no longer contribute to the scenic historical character of the District, they would be removed under both the Project and Alternative 2, but retained under the Modified Alternative 2. Overall, the Project Site has limited visual quality and does not contain significant aesthetic or visual resources. Therefore, development under either the Modified Alternative 2, the Project or Alternative 2 would not substantially damage scenic resources that contribute to the area's scenic value. Impacts under the Modified Alternative 2, the Project and Alternative 2 would be less than significant and similar since aesthetic impacts are not considered significant pursuant to SB 743 and ZI No. 2452.

(iii) Consistency Regulations that Govern with Scenic Quality

CEQA Appendix G addresses whether a project in an urban area would conflict with regulations that govern scenic quality, such as those applicable to street trees, exterior lighting, signage, and compliance with applicable policies of the General Plan or Community Plan. The Modified Alternative 2, the Project and Alternative 2 would comply with the City's street tree requirements and comply with exterior lighting in compliance with LAMC regulations, and would comply with signage regulations set forth under the Hollywood Signage SUD. In addition, none of these would conflict with Objective 7 of the Hollywood Community Plan, which requires the preservation of open space and promotes the preservation of views, natural character and topography of mountainous parts of the Community. The Project Site is visible from the Mulholland Scenic Parkway's Hollywood Bowl Overlook, an area with broad open space views in the Hollywood Hills. None of these would adversely affect views from this open space area and, as such, would be consistent with Objective 7 of the Community Plan to preserve views. None of these would conflict with the LAMC, Hollywood Signage SUD, or the applicable Community Plan open space policy. Impacts under the Modified Alternative 2, the Project and Alternative 2 would be similar since aesthetic impacts are not considered significant pursuant to SB 743 and ZI No. 2452.

Visual Character and Quality. The potential for a project to degrade the existing visual character or quality of public views the site and its surroundings is not applicable to projects in urbanized areas. Nevertheless, the following discussion of scenic quality is provided for informational purposes only.

The Modified Alternative 2, with a 30-story, 348-foot-high tower, and the Project and Alternative 2, with a 20-story, 255-foot-high tower in (Building 1) and three-story (47-foot-high) residential building (Building 2) would change the visual character of the area. Under existing conditions, the on-site multi-family apartment buildings do not possess significant architectural, historical or, otherwise, significant aesthetic character, are located outside the historic district, and do not contribute to the historic district. The Modified Alternative 2 tower would be taller than the Project and Alternative 2, but would have narrower profile along its east/west axis, and the additional height would not cause it to be appreciably different in view from the ground plane near the Project Site. The Modified Alternative 2 design includes a setback of approximately 77 feet from the East Parcels, compared to the lesser setback under the Project and Alternative 2. The Modified Alternative 2 tower would thus also be set back from Vista Del Mar Avenue by approximately 162 feet compared to approximately 85 feet under the Project and Alternative 2. The deeper setback under the Modified Alternative 2 would reduce the contrast of the Modified Alternative 2 with respect to the adjacent single-family neighborhood in the Vista Del Mar/Carlos Historic District, reducing the already less than significant potential impact related to visual character and quality on the historic district.

At present, the Yucca Street frontage is visually dominated by older utility poles and overhead power lines. Adjacent sidewalks are in disrepair and the street lacks amenities such as street trees and security/ pedestrian lighting that would support pedestrian traffic along Yucca Street between Vista Del Mar Avenue and Argyle Avenue. The Modified Alternative 2, the Project and Alternative 2 would all replace the chain link-fenced surface parking lot at the corner of Yucca Street and Vista Del Mar Avenue. It would be replaced by a publicly accessible, landscaped open space under the Modified Alternative 2 and with a landscaped residential use under the Project and Alternative 2. The Modified Alternative 2, the Project, and Alternative 2 would all implement PDF-AES-1 and PDF-AES-2 to relocate overhead utility lines underground and to provide construction fencing to reduce visual impacts of the Project's construction site, respectively. The Modified Alternative 2, the Project, and Alternative 2 would create a varied street front with landscaping and street trees, improved sidewalks, pedestrian and security lighting and retail/restaurant street-front uses. The Modified Alternative 2's 30-story tower would have a greater articulation and slimmer profile than the Project and would be separated from Vista Del Mar by the single-family residences within the Project Site and by the publicly-accessible park at the corner of Argyle Avenue and Vista del Mar Avenue. The Project and Alternative 2's 20-story tower would be separated from Vista Del Mar Avenue by the three-story Building 2, which would buffer and reduce contrast between Building 1 and the Vista del Mar /Carlos Historic District. However, the Modified Alternative 2 eliminates Building 2, preserves the existing residential structures at 1765 and 1771 Vista del Mar Avenue, steps back the tower further away from Vista del Mar Avenue, and would replace an existing surface parking lot with a publicly accessible landscaped park, resulting in substantial visual improvements and improvements that would be compatible to the visual character and setting in and around the Project Site, including the Vista del Mar/Carlos Historic District, than would exist under the Project and Alternative 2. Impacts under the Modified Alternative 2, the Project and Alternative 2 would be less than significant and similar since aesthetic impacts are not considered significant pursuant to SB 743 and ZI No. 2452.

(iv) Light and Glare

The Modified Alternative 2, the Project, and Alternative 2 would introduce new sources of lighting and increase nighttime light levels. Light sources include security, wayfinding, architectural accent lighting, and lighting associated with the retail/restaurant uses. The Modified Alternative 2, the Project and Alternative 2 would all implement PDF-AES-3, which requires that outdoor lighting along streets, rooftops, and courtyards to be placed to minimize visibility from adjacent residential uses. In addition, the Modified Alternative 2, the Project and Alternative 2 would all implement PDF-AES-5 to require that building facades be anti-reflective to minimize glare. Implementation of the PDF and other LAMC lighting regulations would ensure that potential light and glare would not interfere with the performance of off-site activities or substantially alter the function or character of the surrounding area. Since the Modified Alternative 2 and Alternative 2 would eliminate the Project's hotel use, any illuminated signage associated with the hotel would be eliminated and light and glare impacts would be incrementally less and similar under the Modified Alternative 2 and Alternative 2. Pursuant to SB 743 and ZI No. 2452 light and glare impacts would not be considered significant.

(b) Air Quality

(i) Consistency with Air Quality Management Plan

The Modified Alternative 2, the Project, and Alternative 2 would be consistent with the AQMP in their incorporation of appropriate control strategies for emissions reduction during construction, including compliance with SCAQMD Rule 403, CARB off-road diesel standards, L.A. Green Building Code, Air Pollutions Control Officers Association (CAPCOA) recommendations, and Green Building Measures under PDF-AQ-1. The Modified Alternative 2, the Project, and Alternative 2 would be consistent with the applicable growth projections and control strategies used in the development of the AQMP and would not jeopardize attainment of the air quality levels identified in the Plan. During operation, the Modified Alternative 2, the Project, and Alternative 2 would incorporate control strategies set forth in the AQMP such as location efficiency, increased density, transit accessibility, improved development design, and other measures. The Modified Alternative 2, the Project, and Alternative 2 would be consistent with the City's growth projections and policies of the General Plan Air Quality Element for achieving emission reduction goals. As such, impacts with respect to consistency with AQMP and General Plan air quality policies would be less than significant and similar under the Project, Alternative 2 and the Modified Alternative 2.

(ii) Violation of Air Quality Standard/Emissions

(a) Construction

The Modified Alternative 2, the Project, and Alternative 2's construction phases have the potential to generate emissions, including TACs, through the use of heavy-duty construction equipment, generation of construction traffic, fugitive dust emissions, paving operations, and the application of architectural coatings and other building materials. The Modified Alternative 2, the Project, and Alternative 2 would all implement Mitigation Measure MM-AQ-1 to require off-road diesel-powered equipment to meet the CARB and USEPA Tier 4 Final standards and to use pole power to the

extent feasible, which would reduce potentially significant regional construction impacts to a less than significant level. The Modified Alternative 2 would utilize similar construction equipment with a similar daily intensity of proposed usage over the proposed construction phases, operated in accordance with the same applicable identified laws, regulations and mitigation as the Project and Alternative 2. As with the Project and Alternative 2, the Modified Alternative 2's maximum daily localized construction emissions would not exceed the localized thresholds for CO, NOX, PM10, and PM2.5. Therefore, similar to the Project, localized construction emission impacts under the Modified Alternative 2 and Alternative 2 on sensitive receptors would be less than significant. Also, the qualitative assessment as well as the health risk modeling concluded that TAC emissions from construction activities would not expose sensitive receptors to substantial TAC concentrations. Although the health risk modeling analysis is provided for informational purposes only, it demonstrates that construction activities under the Project with incorporation of MM-AQ-1 would not expose sensitive receptors to substantial TAC concentrations. Similar to the Project, the Modified Alternative 2 and Alternative 2 would not expose sensitive receptors to substantial TAC concentrations. However, both the Modified Alternative 2 and Alternative 2 would incrementally reduce the Project's total parking spaces and, in the process, reduce the extent of excavation required for the Project's parking level. In addition, the Modified Alternative 2 would eliminate excavation activities otherwise associated with the Project and Alternative 2's Building 2. Therefore, the Modified Alternative 2 would result in incrementally less excavation and impacts related to dust, haul truck, and equipment emissions, resulting in further reductions to the Project and Alternative 2's already less than significant impacts.

(b) Operation

The Modified Alternative 2, the Project, and Alternative 2 would generate stationary and mobile emissions during operation, and all would implement PDF-AQ-1. PDF-AQ-1 requires energy efficiency features, such as reductions in building energy and resource consumption with energy efficient appliances and reduced building energy usage sufficient to meet the applicable Title 24 standard. Reductions also include compliance with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content.

The use of consumer products generates emissions of VOCs. As documented in the California Emissions Estimator Model (CalEEMod) User's Guide, Appendix A – Calculation Details for CalEEMod, VOC emissions from consumer product use is based on an emission factor for the SCAQMD region multiplied by the total square footage of all building floor area, including residential square footage.² Since the Modified Alternative 2 would have the same total square footage of building floor area as the Project and Alternative 2, the Modified Alternative 2 would result in the same VOC emissions from consumer product usage as the Project and Alternative 2.

Building energy demand results in emissions of criteria pollutants (i.e., VOC, NO_x, CO, SO₂, PM10, and PM2.5) and greenhouse gases (i.e., CO₂, CH₄, and N₂O) from natural gas combustion and the portion of utility supplied electricity generated by fossil fuel combustion. The Modified

² CAPCOA, CalEEMod User's Guide, Appendix A – Calculation Details for CalEEMod, pages 33-34, 2016.

Alternative 2 would have 269 new residential units, two existing residential units and 7,760 square feet of commercial/restaurant space compared to the Project's 210 residential units, 136 hotel rooms, and 12,570 square feet of commercial/restaurant space. Alternative 2 would have 271 residential units and 5,120 square feet of commercial/restaurant space. As shown in Section B-3 (Project Operational Emission – CalEEMod Output Files) of Appendix G-1 of the Draft EIR, the Project's 210 residential units would have a natural gas and electricity demand of approximately 1,923,600 kilo-British thermal units per year (kBtu/yr) and 805,868 kilo-Watt-hours per year (kWh/yr), respectively. The Project's hotel use would have a natural gas and electricity demand of approximately 1,777,730 kBtu/yr and 594,680 kWh/yr, respectively. The Modified Alternative 2's 269 residential units would have an estimated energy demand of approximately 2,464,040 kBtu/yr and 1,032,279 kWh/yr, which is an increase of approximately 540,440 kBtu/yr and 226,411 kWh/yr for the residential uses. However, both Alternative 2 and the Modified Alternative 2's increase in residential energy demand would be more than offset by the removal of the hotel uses and the reduced commercial floor area. This is an expected outcome given that residential uses are generally less energy intensive than hotel uses. In summary, Alternative 2 and the Modified Alternative 2 would have reduced building energy demand compared to the Project and, therefore, would generate less emissions from building energy demand as compared to the Project. Thus, with implementation of PDF-AQ-1, maximum daily net operational emissions, under the Modified Alternative 2, the Project, and Alternative 2 would not exceed the SCAQMD numeric thresholds for air pollutants. Because the Modified Alternative 2, the Project, and Alternative 2 would not exceed SCAQMD numeric thresholds for air pollutants with regard to regional, localized or TAC emissions, as well as CO Hotspots, operational air quality impacts would be less than significant. Because of the elimination of the hotel use, both the Modified Alternative 2 and Alternative 2 would result in an overall lower daily VMT than the Project. In addition, although the Modified Alternative 2 would have the same number of residential units as Alternative 2, it would have more retail and restaurant floor area, resulting in an incrementally higher daily VMT than Alternative 2, but still less than the Project. Impacts related to air quality standards/emissions would be less than significant under the Modified Alternative 2, as they were under the Project and Alternative 2. The Modified Alternative 2 and Alternative 2 would have less impact than the Project, with Alternative 2 resulting in the least impact due to the lowest VMT.

(c) *Cultural Resources*

Both the Project and Alternative 2 would demolish two on-site buildings located within the Vista del Mar/Carlos Historic District at 1765 and 1771 Vista del Mar Avenue. These buildings, however, due to substantial alterations occurring outside of the identified period of significance for the district, these buildings cannot validly be considered contributors to the Historic District because those changes cause the buildings to fail to convey the significance of the district. As such, the demolition of the buildings would not destroy or alter any character-defining features of the Historic District. However, the scale of the Project and Alternative 2 would contrast with the Historic District's one- and two-story single-family homes, and have the potential to indirectly impact the setting and original layout of the historic district. In this regard, the Project and Alternative 2's three-story Building 2 would provide a transitional buffer between the 20-story, contemporary tower (Building 1) and the adjacent historic district. Further, Building 2 would incorporate elements of the Prairie style to support compatibility with the Craftsman style Historic

District contributors. With its transitional sizing and design, both the Project and Alternative 2's Building 2 within the historic district would conform with Secretary of the Interior's Standards for Rehabilitation No. 9 to provide for differentiation and compatibility of massing, size, scale, and architectural features and Standard No. 10 to undertake new development in such a manner that, if removed in the future, the essential form and integrity of the historic district and its environment would be unimpaired.³ With consistency with these standards, the Project and Alternative 2 would result in similar and less than significant direct or indirect impacts on the Historic District.

To assess the impacts to historical resources from the Modified Alternative 2, ESA prepared a Memorandum: Amendment to Historical Resources Assessment and Environmental Impacts Analysis, 6220 West Yucca Project, Los Angeles, California, (the Historical Resources Memorandum) dated July 1, 2020, which is included in Appendix C-1 of this Final EIR. As discussed therein, the Modified Alternative 2 would eliminate the Project's Building 2, would not demolish the existing residences located at 1765 and 1771 N. Vista Del Mar, and would return the residence located at 1765 N. Vista Del Mar, which had previously been converted to a duplex in the main structure with an additional apartment unit over the garage, to a single-family residence without changing the already modified exterior of the structure. The Modified Alternative 2 would also convert the existing paved surface parking lot within the Project Site at the corner of Yucca Street and Vista Del Mar Avenue to a publicly accessible landscaped open space/park. The proposed park would provide a landscaped open-space at the north entrance to the district that would be compatible with the characteristics of the district including its landscaped residential setbacks and tree-lined streets, and the proposed park would also provide a buffer between the district and the surrounding built environment to the north and west. The construction of the proposed park under the Modified Alternative 2 would not physically impact any identified historical resources, it would be compatible with the district's character, it would visually and physically enhance the district, and it would protect the integrity of the district. Therefore, the proposed park would have no adverse impact on, but would conversely enhance the Vista del Mar/Carlos Historic District.

Although the residences at 1765 and 1771 N. Vista Del Mar and the park (former parking lot) are not contributors to the Vista del Mar/Carlos Historic District, the Modified Alternative 2's retention of the two residences without any alteration to their exterior appearance and creation of a park at the site of the former surface parking lot align with Standards 9 and 10 of the Secretary of Interior Standards for Rehabilitation, for the reasons discussed in the Historical Resources Memorandum. That is, like the Project, although the Modified Alternative 2 would not directly impact or rehabilitate any historic buildings, it would align with Secretary of Interior Standards for Rehabilitation, Standard 9 because its new construction would not destroy any of the historic materials that characterize the Vista del Mar/Carlos Historic District, its new construction would be differentiated from the old construction and would be compatible with the massing, size, scale and architectural features to protect the historic integrity of the district and its environment. Also like the Project, the Modified Alternative 2 would also align with Standard 10 because, if the Modified Alternative 2 tower were removed in the future, the essential form and integrity of the

³ ESA, *Historical Resources Assessment and Environmental Impacts Analysis for 6220 West Yucca Street Project*, August 2019, page 88, contained in Appendix D of this Draft EIR.

existing Vista del Mar/Carlos Historic District would not be impaired. Therefore, as analyzed in the Historical Resources Memorandum, the Modified Alternative 2 would have even less of an effect on the Vista del Mar/Carlos Historic District than the Project's already less than significant effect.

Indirect impacts of the Modified Alternative 2 compared with Project were also analyzed in the Historical Resources Memorandum. As evaluated in the Historical Resources Assessment Report included as Appendix D-1 of the Draft EIR (Chapter V, Section B, Part 3, Impacts Analysis Using Los Angeles CEQA Thresholds), there are seven (7) historical resources in the Project vicinity that would have views of the Project; including former Little Country Church of Hollywood, Capitol Records Building, Pantages Theatre, Hollywood Equitable Building, Hollywood Boulevard Commercial and Entertainment District, and the Hollywood Walk of Fame. However, changes to the setting caused by the Project would have no effect on the listing eligibility of these resources. Based upon survey and review of existing conditions, the predominant character within the Project Site vicinity is made up of mixed commercial low-rise to high-rise developments and residential single-family low-rise to multi-family high-rise developments of varying densities, heights, footprints and architectural styles that span from the 1900s to the 2000s, including two recent tower projects located adjacent to the Project Site. Similar to the Project, the Modified Alternative 2 would not alter the setting of the seven (7) historical resources located in the Project vicinity in a manner that would materially impair their historical significance or integrity, and indirect potential impacts on these resources would be less than significant.

In comparison to the Project, which includes a 20-story tower (Building 1) at the western portion of the Project Site, the Modified Alternative 2 would reduce the bulk and massing of Building 1 while at the same time increasing its height. Under the Modified Alternative 2, the new building would be developed with a narrower east/west profile than the Project and would increase the building height from 20 stories (255 feet) under the Project, to 30 stories (348 feet) under the Modified Alternative 2. Under the Modified Alternative 2, the building dimensions would be reduced to approximately 80 feet x 180 feet as compared to the Project's high-rise component's dimension of 80 feet x by approximately 257 feet. The reduction would occur along the east/west axis, thus reducing the high-rise profile as viewed from the north from Yucca Street and from the south. This reduction would also allow for a greater setback of the high-rise component from Vista Del Mar Avenue. The Modified Alternative 2 would have an east/west dimension of approximately 180 feet. By comparison, the east/west dimension of the Project's 20-story tower would be approximately 257 feet. The north/south dimension of the high-rise component would be 80 feet, similar to the Project. However, like the Project, the scale and massing of the Modified Alternative 2 would similarly alter the visual context of nearby resources, such as the Vista Del Mar/Carlos Historic District, the site of the former Little Country Church of Hollywood, Capitol Records Building, Pantages Theatre, Hollywood Equitable Building, Hollywood Boulevard Commercial and Entertainment District, and the Hollywood Walk of Fame. However, the historic settings for these resources have already been altered by changes and redevelopment in the area after the period of significance of these resources, including, without limitation, the construction of the Yucca Argyle Apartments in 1953 and the Hollywood Freeway completed by the late 40s and early 50s to the northeast of the Project Site. Neither the Project nor the Modified Alternative 2 would physically alter any previously identified historical resources in the Project

vicinity or would alter the contributing setting of any nearby historical resources. All identified resources would maintain the same level of eligibility as historical resources with the Modified Alternative 2 in place. Therefore, the Modified Alternative 2 would not have any significant impacts on any historical resources in the Project vicinity. See the Historic Resources Memorandum for additional details on indirect impacts to historic resources in the Project vicinity.

Regarding indirect impacts during construction, under the Modified Alternative 2, Building 2 would not be constructed within the Vista del Mar/Carlos Historic District, which would eliminate any adverse physical intrusions into the district by new construction, maintaining the current appearance, building layouts, and scale of the district with the inclusion of a new, district enhancing park at the corner of Yucca Street and Vista del Mar Avenue.

Regarding potential vibration impacts on the adjacent residential structures on Vista del Mar Avenue that identified historic district contributors, as addressed on page IV.I-61 in Section IV.I, *Noise*, of the Draft EIR and in the Noise analysis below, the implementation of Mitigation Measure MM-NOI-3 would ensure that construction groundborne vibration levels for the Project would be below the significance threshold of 0.2 inches per second (PPV) for potential structural damage impacts at the nearest single-family residential building adjacent to the site along Vista Del Mar Avenue by requiring requires a 15-foot buffer between the nearest off-site building and heavy construction equipment operations.

Even though substantial evidence supported the conclusion that MM-NOI-3 would reduce impacts to a less than significant level, the level at which groundborne vibration impacts would be reduced (0.191 inches per second (PPV)) was still close to the threshold (0.2 inches per second (PPV)), and therefore the Draft EIR conservatively concluded impacts could nonetheless potentially be significant.

Therefore, as an additional cautionary measure, MM-NOI-4 was implemented, which: (1) requires the implementation of an expert created, City-approved vibration monitoring program at the neighboring properties along Vista del Mar Avenue, including 1761-1763 Vista del Mar Avenue; (2) includes a provision that, if monitored vibration levels ever exceed a minimum warning level (0.15 inches per second (PPV)), feasible steps would be taken to ensure vibration levels are kept below the threshold; and (3) states that if monitored vibration levels exceed the threshold level of 0.2 inches per second (PPV), construction near the neighboring structures would halt, neighboring structures would be examined for damage, and any such damage would be fully repaired.

As a further precautionary measure put in place in response to public comments regarding ensuring the protection of the Vista del Mar/Carlos Historic District, MM-NOI-4 has been amended to state that monitoring would occur at the closest reasonable point between the Project Site and the neighboring Vista del Mar historic contributors – which could include monitoring on the Project Site itself in the absence of consent by neighboring property owners to allowing vibration monitoring equipment to be placed on their property. With this more protective measure in place, the conclusion of the Draft EIR that vibration impacts to the neighboring residential properties along Vista del Mar, including the adjacent historic district contributor at 1761-1763 Vista del Mar, may not be reduced to a less than significant level has been revised to state that such mitigation

would reduce potential impacts to a less than significant level, as the implementation of mitigation is no longer contingent on neighboring property owner consent to be implemented. The conclusion that impacts would be less than significant is supported by substantial evidence.

As yet a further precautionary measure put in place to respond to public comments expressing concerns regarding ensuring the protection of the Vista del Mar/Carlos Historic District, MM-NOI-4 has been clarified in this Final EIR to state that, in unlikely and unexpected event of inadvertent damage to the neighboring residential properties along Vista del Mar, including the adjacent historic district contributor at 1761-1763 Vista del Mar, the repair work already called for by MM-NOI-4 to any district contributors would be conducted in accordance with the requirements of the Secretary of Interior Standards for Rehabilitation pursuant to CEQA Guidelines Section 15064(b)(3). Notably, repair of any historic district contributor to those standards would be required by the City in any event, as any building permits, including for repair work issued for historic resources in the City automatically trigger review by the City's Office of Historic Resources, which would require that any such repair work be conducted in accordance with applicable Secretary of Interior standards. The revised MM-NOI-4 now reflects this fact. Accordingly, based on substantial evidence in the Draft EIR and mitigation measures as revised, the Project would not result in significant impacts to any district contributors.

Notably, the Modified Alternative 2 would, as a function of the elimination of the construction of Building 2 and maintenance of the buildings at 1795 and 1771 Vista del Mar Avenue, not include the use of heavy construction equipment that would cause vibration impacts within at least 20 feet of the nearest adjacent contributor to the Vista del Mar/Carlos Historic District located at 1761-63 Vista del Mar Avenue. So with the Modified Alternative 2, neither MM-NOI-3 or MM-NOI-4 as originally proposed in the Draft EIR or revised herein are required to ensure a less than significant vibration impact on any adjacent or nearby buildings to the Project Site, including district contributors. This is because maintaining a distance of at least 15 feet for the operation of such equipment was determined based on substantial evidence to reduce impacts to a less than significant level. At 20 feet, the maximum vibration level from the construction equipment used for the Modified Alternative 2 would be 0.124 PPV, which is well below the significance threshold of 0.2 PPV. (See Final EIR, Appendix C-1) The Modified Alternative 2 would nonetheless continue to incorporate MM-NOI-3 and MM-NOI-4 as revised to further reduce the Modified Alternative 2's already less than significant potential cultural resource impacts in recognition of the importance of ensuring maximum protection to the Vista del Mar/Carlos Historic District.

Based on the whole of the analysis above, while the Modified Alternative 2 would include a taller building height than the Project for the proposed tower, and the Modified Alternative 2 would retain the existing residential properties at 1765 and 1771 N. Vista Del Mar and provide a new park at the southwest corner of Vista Del Mar and Yucca Street, the Modified Alternative 2 would have even less of an effect on the Vista Del Mar/Carlos Historic District than the Project's less than significant effect. With other indirect impacts on offsite cultural resources being substantially similar to the Project, for this reason, impacts regarding historic resources are considered less under the Modified Alternative 2 than the Project.

(d) *Energy*

The Modified Alternative 2, the Project, and Alternative 2 would increase demand for electricity, natural gas, and transportation energy, during construction and operation. The Project would increase annual electricity consumption by 3,417,600 kWh per year (representing approximately 0.013 percent of LADWP's projected sales in 2021) and would account for approximately 0.0006 percent of the 2022 forecasted consumption in SoCalGas's planning area. Acknowledging that the Modified Alternative 2, the Project, and Alternative 2 would have a similar floor area, but with varied uses, the Modified Alternative 2's energy demand and energy conservation features would not be materially different from the Project or Alternative 2 such that it would cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation. Impacts related to efficient energy consumption under the Modified Alternative 2, the Project, and Alternative 2 would be less than significant.

The location of the Modified Alternative 2, the Project, and Alternative 2 on an infill site in a Transit Priority Area and a High Quality Transit Area and in proximity to existing high-quality transit stops, entertainment, and commercial uses, would achieve a reduction in VMT less than the Hollywood Community Plan, City, and statewide averages. In addition, the Modified Alternative 2 and Alternative 2 would require less fuel consumption because Alternative 2 would generate 6,663 total daily VMT, and the Modified Alternative 2 would generate 7,476 total daily VMT versus the Project, which would generate 11,929 total daily VMT.

Also, because the Modified Alternative 2, the Project, and Alternative 2 would incorporate a variety of energy conservation measures and features to reduce energy and water usage and minimize energy demand, they would not conflict with applicable state and local conservation plans. Thus, similar to the Project and Alternative 2, the Modified Alternative 2 would have a less than significant impact regarding the provisions of plans for renewable energy and energy efficiency. As the Modified Alternative 2 would be in compliance with plans for renewable energy and energy efficiency, impacts under the Modified Alternative 2 would be similar to the Project and Alternative 2.

(e) *Geology, Soils, and Paleontological Resources*

(i) *Exacerbation of Existing Environmental Conditions*

The Project Site is located within the designated Alquist-Priolo Earthquake Fault Zone for the Hollywood Fault and, as such, requires a geologic fault rupture investigation that demonstrates a proposed building site is not threatened by surface displacement from the fault.⁴ However, Geotechnical faulting investigations have indicated that no active faulting, including the Hollywood Fault, occurs beneath or projects toward the Project Site.⁵ Although the Project Site is subject to potential earthquake ground shaking, implementation of applicable LAMC Chapter IX (Building Code) seismic design provisions would require the latest seismic design standards for structural

⁴ Earthquake Fault Zones, Special Publication 42, Interim Revised 2018, prepared by Department of Conservation, California Geological Survey, <ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sp/Sp42.pdf>, accessed October 2018.

⁵ Group Delta, Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, pages 7-8, March 2019. Contained in Appendix F of this Draft EIR.

loads and materials, and accommodate maximum ground accelerations from known faults. Respectively, a design-level geotechnical report, applicable to the Modified Alternative 2, the Project, and Alternative 2, will be required to develop geotechnical recommendations for final design, including drilling and sampling geotechnical borings and detailed engineering analyses. With implementation of applicable regulations and recommendations of the geotechnical report, impacts with respect to ground shaking under the Modified Alternative 2, the Project, and Alternative 2 would be less than significant.

The Project Site is located within an area susceptible to liquefaction.⁶ However, site-specific liquefaction analysis indicates that the Project Site is primarily underlain by dense/stiff older alluvial soils that are not considered susceptible to liquefaction or lateral spreading.⁷ Excavation for the Modified Alternative 2, the Project, and Alternative 2's subterranean parking would remove the loose sand deposit and require suitable engineered stabilization in accordance with applicable City and CBC requirements. The Project Site is not located within a designated landslide area, and the potential for landslide and seismically induced slope instability at the Project Site is considered to be low.⁸ Application of appropriate engineering controls and compliance with regulations for planned excavation and construction activities under the Modified Alternative 2, the Project, and Alternative 2 would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of the Modified Alternative 2, the Project, and Alternative 2 would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in whole or in part by the exacerbation of existing environmental conditions. Impacts related to existing fault rupture, seismic shaking, liquefaction, or other geologic conditions would be less than significant under the Modified Alternative 2, the Project, and Alternative 2. However, the Modified Alternative 2 and Alternative 2 would reduce the Project's scope of excavation required for the Project's parking levels. Moreover, with the elimination of Building 2 under the Modified Alternative 2, excavation in the East Parcels would not be required and the scope of excavation would be less than under Alternative 2. Therefore, impacts related to geologic conditions would be reduced by the Modified Alternative 2 as compared to the Project or Alternative 2.

(i) *Unstable Geologic Units*

The Modified Alternative 2, the Project, and Alternative 2 would require foundation excavations. Per LAMC requirements and standard City conditions of approval, prior to issuance of a grading permit for the Modified Alternative 2, the Project, and Alternative 2, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulations. Recommendations would include a shoring system of soldier piles with internal bracing and/or tied-back anchors and other suitable excavation engineering techniques. With adherence to the recommendations of the Final Geotechnical Report and applicable conditions and local and state

⁶ City of Los Angeles General Plan, Safety Element, Exhibit B (shown in Figure IV.D-5 of this Draft EIR).

⁷ Group Delta, Update Geotechnical Feasibility Report, Proposed High-Rise Residential Development, 6220 West Yucca Street, page 9, March 2019. Contained in Appendix F-1 of this Draft EIR.

⁸ Group Delta, Op. Cit., page 9.

Building Code (grading) requirements, impacts with respect to unstable geologic units would be less than significant under the Modified Alternative 2, the Project, and Alternative 2. However, the Modified Alternative 2 and Alternative 2 would reduce the Project's total subterranean parking and its conservatively analyzed excavation quantity of approximately 120,000 CY. Moreover, with the elimination of Building 2 under the Modified Alternative 2, excavation in the East Parcels would not be required and the total scope of excavation would be approximately 24,000 CY, substantially less than under the Project and incrementally less than under Alternative 2. Therefore, impacts related to excavation and unstable geologic units would be reduced by the Modified Alternative 2 as compared to the Project or Alternative 2.

(ii) Expansive Soils

Under the Modified Alternative 2, the Project, and Alternative 2, the corrosive and expansive potential of the soils would be addressed in the Final Geotechnical Report and taken into consideration prior to the installation of all underground pipes/clamps/structures. Compliance with standard construction and engineering practices (e.g., onsite excavation requiring suitable engineered stabilization, proper engineering erosion control and proper engineering drainage design), addressing expansive soils and Building Code regulations pertinent to foundation stability would ensure that expansive soils are removed, as necessary. Implementation of these regulations and practices would reduce hazards associated with potential expansive soils or corrosive soils. As such, impacts regarding expansive and corrosive soils would be less than significant and similar under the Modified Alternative 2, the Project, and Alternative 2.

(iii) Paleontological Resources

Excavation for the Project, and Alternative 2 would be to depths of approximately 22 to 25 feet below surface for the subterranean parking levels, with footings extending to approximately 40 feet below ground surface. Estimated depths under the Modified Alternative 2 for parking would be approximately 20 feet below ground surface, with footings extending to approximately 40 feet below ground surface. As such, the Modified Alternative 2, the Project, and Alternative 2 have the potential to encounter paleontological resources in previously undisturbed soils. In addition, the Project Site contains older Quaternary alluvial fan and fluvial deposits that potentially contain fossil specimens, which could also be impacted by excavation activities. The Modified Alternative 2, the Project, and Alternative 2 would all require the implementation of mitigation measures MM-PALEO-1 through MM-PALEO-3. These mitigation measures would provide for appropriate treatment and/or preservation of resources, if encountered. Under the Modified Alternative 2, the Project, and Alternative 2, potentially significant impacts to paleontological resources would be mitigated to levels that are less than significant. However, the Modified Alternative 2 and Alternative 2 would reduce the Project's extent of excavation required for the Project's subterranean parking levels. Moreover, with the elimination of Building 2 under the Modified Alternative 2, excavation in the East Parcels would not be required and the scope of excavation would be less than under Alternative 2. Therefore, impacts related to excavation and the discovery of paleontological resources would be reduced by the Modified Alternative 2 as compared to the Project or Alternative 2.

(f) *Greenhouse Gas Emissions*

The construction and occupation of the Project Site under the Modified Alternative 2, the Project, or Alternative 2 would increase GHG emissions over existing conditions. The Project's net operational emissions of 3,063 MTCO₂e would be approximately 22 percent below the Project's net operational emissions that would be generated by the Project under the NAT scenario. The Modified Alternative 2, the Project, or Alternative 2 would implement PDF AQ-1 and PDF-GHG-1 to further reduce GHG emissions and, like the Project and Alternative 2, the Modified Alternative 2 would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's RTP/SCS, L.A.'s Green New Deal (Sustainable City pLAn 2019), and the City's Green Building Ordinance for the same reasons as the Project and Alternative 2 related to the construction of a new, efficient, high density new infill mixed-use development within a Transit Priority Area/ High Quality Transit Corridor, which analysis is further supported by the reduced overall GHG emissions that would be produced by the Modified Alternative 2 as compared to the Project. GHG impacts under the Modified Alternative 2, the Project, or Alternative 2 would be less than significant. However, as indicated because the Modified Alternative 2 and Alternative 2 would reduce the Project's daily VMT and thus mobile emissions, impacts with respect to GHG emissions would be reduced by the Modified Alternative 2 and Alternative 2 as compared to the Project. GHG impacts under the Modified Alternative 2 would be incrementally greater than Alternative 2 due its slightly higher VMT.

(g) *Hydrology and Water Quality*

(i) *Construction*

Construction activities under the Modified Alternative 2, the Project, and Alternative 2 include excavation and grading, maintenance/operation of construction equipment, potential dewatering, and handling/ storage/disposal of materials. These activities could contribute to pollutant loading in stormwater runoff or groundwater, and potential changes in runoff. In addition, exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events. On-site water activities for dust suppression could contribute to pollutant loading in runoff from the construction site. However, potential impacts under the Modified Alternative 2, the Project, and Alternative 2 would be reduced to less-than-significant levels through compliance with City regulatory requirements and a required NPDES permit, which would include a construction Storm Water Pollution Prevent Plan ("SWPPP") and a suite of Best Management Practices ("BMPs") to reduce pollutant runoff and erosion. BMPs would ensure that the Modified Alternative 2, the Project, and Alternative 2 would not exceed surface and groundwater water quality standards during construction. BMPs would also control the direction and volume of runoff so that the capacities of existing storm drains would not be exceeded and existing drainage patterns would not be altered. As such, existing regulations, which include implementation of required BMPs, would reduce the Modified Alternative 2, the Project, and Alternative 2's hydrology and water quality impacts related to construction to less than significant. Also, the Modified Alternative 2 and Alternative 2 would reduce the Project's extent of excavation required for the Project's subterranean parking levels. Moreover, with the elimination of Building 2 under the Modified Alternative 2, excavation in the East Parcels would not be required and the scope of excavation would be less than under Alternative 2. Therefore, impacts related to exposure of

soils and excavated materials would be reduced by the Modified Alternative 2 as compared to the Project or Alternative 2.

(ii) Operation

The Modified Alternative 2, the Project, and Alternative 2 would have similar building setbacks and would similarly result in approximately 94 percent imperviousness of the Project Site. The Modified Alternative 2, the Project, and Alternative 2 would all implement the City's Low Impact Development ("LID") measures in accordance with the City's LID Ordinance, which include various measures including biofiltration, rainwater harvesting, and infiltration, which when implemented would result in an effective change in Q10 runoff of -0.12 cfs, and effective change in Q50 runoff of 0 cfs. As such, the Modified Alternative 2, the Project, and Alternative 2 would reduce existing runoff from the Project Site. Compliance with existing LID regulations would ensure that the Modified Alternative 2, the Project, and Alternative 2 would not exceed surface and groundwater water quality standards during operation. The required LID implementation would also ensure that the area's existing drainage patterns would not be altered in a manner that would cause a significant impact or that the rate and amount of surface runoff would not result in substantial on- or off-site siltation, erosion, or flooding. Therefore, impacts with respect to hydrology and water quality during operation would be less than significant and similar under the Modified Alternative 2, the Project, and Alternative 2.

(h) Land Use and Planning

The Modified Alternative 2, the Project, and Alternative 2 would require a zone change to create a higher density and intensity of use than allowed under current zoning standards. Although most land use plans do not directly address environmental effects, land use and zoning designations are intended to physically organize a community and prevent encroachment of conflicting uses. The Modified Alternative 2, the Project, and Alternative 2 would implement the objectives of the General Plan Framework Element with respect to providing a diversity of uses in accordance with the Project Site's Regional Center Designation and concentration of mixed-use development along a transit corridor less than 0.25 miles from the Hollywood/Vine Metro Red Line, other public transit, and within walking distance of a broad range of uses in a manner that would reduce future resident and occupants' VMT. The Project would further the policies of the Health and Wellness Element and the Housing Element's anti-displacement and sustainability standards by replacing 43 existing RSO residential units with 210 RSO units, while Modified Alternative 2 would also be consistent with this policy and with the RSO by providing 252 RSO units and 17 covenanted affordable units at the Very Low Income level. The Modified Alternative 2, the Project, and Alternative 2 would all implement the policies of the CALGreen Code, the Los Angeles Green Building Code, and LEED building design standards. The Modified Alternative 2, the Project, and Alternative 2 would all provide bicycle parking spaces, increase residential density in proximity to transit, and improve sidewalks and pedestrian safety along Yucca Street, Vista Del Mar Avenue, and Argyle Avenue and would, thus, meet the policies of the Hollywood Redevelopment Plan, the City's Mobility Plan 2035, and SCAG RTP/SCS policies to support and encourage a land use pattern and circulation system that supports pedestrians, bicycles, and mass transit in existing urban environments, thus reducing vehicle miles. Overall, the density and location of the Modified Alternative 2, the Project, and Alternative 2 would not conflict with policies of local and regional land use plans adopted to avoid or mitigate environmental effects and, as such, impacts with

respect to land use would be less than significant and similar under the Modified Alternative 2, the Project, and Alternative 2.

(i) *Noise and Vibration*

(i) *Construction*

Under the Modified Alternative 2, the Project, and Alternative 2, construction activities would require the use of heavy-duty machinery, which would increase noise levels at several sensitive receptor locations in the area. The Modified Alternative 2, the Project, and Alternative 2 would all implement MM-NOI-1, which would provide for sound barriers that would achieve a noise reduction of 15 dBA, MM-NOI-2, which would require equipment noise control, and MM-NOI-3, which would maintain a 15-foot setback between large equipment and adjacent, off-site residences, as well as provide for an on-site construction liaison. Although these mitigation measures would result in a substantial reduction in noise and vibration, construction noise levels would still increase the daytime ambient noise level above the 5-dBA significance threshold at adjacent residential uses along Vista Del Mar Avenue (Location R3), the residential uses to the west across Argyle Avenue (Location R1), the upper floors of the five-story mixed-use residential uses south of Carlos Avenue (Location R4), and those on the north side of Yucca Street (Location R2) even after implementation. With respect to potential vibration impacts on the adjacent residential structures on Vista del Mar Avenue, as addressed on page IV.I-61 in Section IV.I, *Noise*, of the Draft EIR, and above regarding Cultural Resources, the implementation of Mitigation Measure MM-NOI-3 would ensure that construction groundborne vibration levels for the Project would be below the significance threshold of 0.2 inches per second (PPV) for potential structural damage impacts at the nearest single-family residential buildings adjacent to the Project Site along Vista Del Mar Avenue. This mitigation measure requires a 15-foot buffer between the nearest off-site building and heavy construction equipment operations. Implementation of the mitigation measure would reduce groundborne vibration levels to 0.191 inches per second (PPV), which is below the applicable significance threshold of 0.2 inches per second (PPV).

Even though substantial evidence supported the conclusion that MM-NOI-3 would reduce impacts to a less than significant level, the level at which groundborne vibration impacts would be reduced (0.191 inches per second (PPV)) was still close enough to the threshold (0.2 inches per second (PPV)) that the Draft EIR conservatively concluded Project impacts could nonetheless potentially be significant.

However, as stated above MM-NOI-4, providing for a groundborne vibration monitoring program has been revised to no longer require the consent of neighboring property owners to be implemented, and could now be implemented on the Project Site without any possibility of its implementation being frustrated. Mitigation Measure MM-NOI-4: (1) requires the implementation of an expert created, City-approved vibration monitoring program at the neighboring properties along Vista del Mar Avenue; (2) includes a provision that, if monitored vibration levels ever exceed a minimum warning level (0.15 inches per second (PPV)), feasible steps would be taken to ensure vibration levels are kept below the threshold; (2) states that if monitored vibration levels exceed the threshold level of 0.2 inches per second (PPV), construction near the neighboring structures would halt, neighboring structures would be examined for damage, and any such damage would be fully repaired. Accordingly, the conclusion of the Draft EIR that structural vibration impacts

could still be significant even with mitigation has appropriately been revised to state that such mitigation would reduce any such impacts to a less than significant level, as it is no longer contingent on neighboring property owner consent to be implemented. This conclusion is supported by substantial evidence.

Additionally, critically, as also noted above, the Modified Alternative 2, as a result of elimination of Building 2 and maintenance of the existing residential buildings at 1765 and 1771 Vista del Mar, would not entail the use of vibration-producing heavy construction equipment within at least 20 feet of neighboring residential structures along Vista del Mar, and therefore its groundborne vibration impacts with respect to building damage would be less than significant without the need for any mitigation. (See Final EIR, Appendix C-1.) The Modified Alternative 2 would nonetheless implement MM-NOI-3 and MM-NOI-4 to further reduce its less than significant groundborne vibration impacts regarding structural vibration damage to adjacent buildings to provide additional protection to the Vista del Mar/Carlos Historic District

Although the groundborne vibration levels would be under the structural damage threshold, temporary, construction-related groundborne vibration and groundborne noise impacts on human annoyance would still exceed the human perceptibility threshold within groundborne vibration-sensitive uses, which include residential uses, although these impacts would be reduced. Therefore, human annoyance impacts on the residential buildings along Vista Del Mar Avenue would be significant and unavoidable after implementation of mitigation measures under the Modified Alternative 2, the Project, and Alternative 2. The Modified Alternative 2 and Alternative 2 would have a similar building floor area and size, although the Modified Alternative 2 would not require construction of Building 2 in the East Parcels. However, because maximum construction groundborne vibration levels would be similar, the Modified Alternative 2, the Project, and Alternative 2 would result in significant and unavoidable construction vibration impacts with respect to human annoyance. However, the Modified Alternative 2 and Alternative 2 would reduce the size of the Project's automobile parking garage and, as such, reduce the extent of excavation required for the Project's parking levels. The Modified Alternative 2 would provide more above-grade parking than either Alternative 2 or the Project and would substantially reduce excavation volumes. Moreover, with the elimination of Building 2 under the Modified Alternative 2, excavation in the East Parcels would not be required and the scope of excavation would be less than under Alternative 2. Therefore, the duration of impacts related to high noise and vibration levels during the excavation phase for the Modified Alternative 2 would be less than either the Project or Alternative 2.

(ii) Operation

Operation under the Modified Alternative 2, the Project, or Alternative 2 would increase mobile source noise (traffic) and onsite stationary and composite noise levels compared to existing conditions. The Modified Alternative 2, the Project, and Alternative 2 would implement MM-NOI-5, which would require a sound enclosure or equivalent noise-attenuating features at the emergency generator. Composite noise from on-site activities under the Modified Alternative 2, the Project, and Alternative 2 would not exceed the City's threshold standards. Therefore, with the implementation of MM-NOI-5, stationary-source noise levels under either the Project, Alternative 2, or the Modified Alternative 2 would be less than significant. Regarding mobile-source noise, Project-related off-site traffic noise increases would not exceed the City's noise

threshold standard. However, because daily VMT would be less under the Modified Alternative 2 (the Modified Alternative 2 would generate 8,460 total daily VMT versus the Project, which would generate 11,929 total daily VMT), mobile noise impacts would be reduced as between the Project and the Modified Alternative 2, though notably Alternative 2's total daily VMT is less than that of the Modified Alternative 2 (Alternative 2's total daily VMT is 6585). As such, although both the Project and the Modified Alternative 2 would generate less than significant operation noise impacts, impacts would be reduced under the Modified Alternative 2 as compared to the Project, though the Modified Alternative 2's impacts would be incrementally greater than Alternative 2's.

(a) Outdoor/Open Space Activity

The Project and Alternative 2 would both incorporate outdoor space, including a recreational courtyard on Level 4. The courtyard would be equipped with lounge seats, an active lounge, gas fire pit and lounge, BBQ, and dining tables and chairs. Building 1 under both the Project and Alternative 2 would also include a pool/roof garden space and small bar on Level 20. Building 2 would include a roof garden on Level 4.

The Modified Alternative 2 would provide outdoor/open space on the ground level (Level 2), Level 6 and Level 30. Open space would include 2,820 square feet of park space on the ground level, 14,720 square feet of a podium courtyard on Level 6 (including a swimming pool, and a 6,260 square foot roof garden on the Level 30).

The Modified Alternative 2's park space would be a potential noise source for the nearest residential uses at sensitive receptor locations R2 (residential and hotel uses on north side of Yucca Street) and R3 (residential uses along Vista Del Mar), which are located approximately 65 and 45 feet away from the Project Site boundary. Under a highly conservative scenario, the park space could generate approximately 94 visitors on the open space at one time.⁹ The noise level from human conversation would be approximately 55 dBA per person (speaking) at a distance of 3 feet.¹⁰ Conservatively assuming half of the visitors would be talking simultaneously (i.e., 47 people), the continuous noise level could be up to approximately 72 dBA at 3 feet. Based on a noise level of 72 dBA at a reference distance of 3 feet, and accounting for distance attenuation (27 dBA at R2 and 24 dBA at R3), the park noise level would be 45 dBA at the R2 noise sensitive receptors along Yucca Street, which would not exceed the significance threshold of 66 dBA, and 48 dBA at the R3 noise sensitive receptors along Vista Del Mar, which would not exceed the significance threshold of 63 dBA.¹¹

It should be noted the analysis of open space noise is extremely conservative as it assumes all persons speaking would be located at the closest edge of the open space area to the noise

⁹ The park space is approximately 2,820 sf. The assembly area allowance in the Building Code is 15 sf/person. Thus, this courtyard area could accommodate approximately 188 people. However, with tables, chairs and benches provided during a social event with that number of people, an estimate of approximately 94 people is provided, which assumes half of the space would be filled with tables, chairs and/or other non-occupied space.

¹⁰ American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012). <https://aja.pubs.asha.org/article.aspx?articleid=1773811>, accessed July 2019.

¹¹ The open space noise levels of 45 dBA at R2 and 48 dBA at R3 would be less than the existing ambient noise levels by 10 or more dBA at both locations; therefore, it would not contribute an audible increase in the existing ambient noise levels at R2 or R3.

sensitive receptor locations. In reality, people would be located throughout the open space area and not concentrated in any one particular area. Thus, open space noise levels at the noise sensitive receptor locations would be substantially lower than disclosed herein.

The Modified Alternative 2 would include a podium courtyard on Level 6, located approximately 59 feet above ground measured from Level 1 to the podium courtyard, and would be a potential noise source for the closest sensitive receptor locations R1 (residential uses to the east across Argyle Avenue – Argyle House), R2, R3 and R4 (residential uses south of Carlos Avenue), which are located approximately 80, 65, 160 and 50 feet away from the Project Site boundary. Under a conservative scenario, there could be up to approximately 491 visitors on the podium courtyard at one time on a peak weekend day.¹² Conservatively assuming half of the visitors would be talking simultaneously (i.e., 246 people), the continuous noise level could be up to approximately 79 dBA at 3 feet. Based on a noise level of 79 dBA at a reference distance of 3 feet, and accounting for distance attenuation (29 dBA at R1, 27 dBA at R2, 35 dBA at R3 and 24 dBA at R4), the podium courtyard noise level would be 50 dBA at the R1 noise sensitive receptors along Argyle Avenue, which would not exceed the significance threshold of 70 dBA, 52 dBA at the R2 noise sensitive receptors along Yucca Street, which would not exceed the significance threshold of 66 dBA, 44 dBA at the R3 noise sensitive receptors along Vista Del Mar Avenue, which would not exceed the significance threshold of 63 dBA, and 54 dBA at the R4 noise sensitive receptors along Carlos Avenue, which would not exceed the significance threshold of 61 dBA.¹³

The Modified Alternative 2's roof garden would be located on Level 30, approximately 312 feet above ground measured from Level 1 to the roof garden, and would be a potential noise source for the closest residential uses at sensitive receptor locations R1 and R4, and would be located approximately 80 and 90 lateral feet from the roof garden on Level 30. Therefore, the pool/roof garden would be located approximately 322 feet and 325 feet closest residential uses at sensitive receptor locations R1 and R4 along Argyle Avenue and Carlos Avenue. Under a conservative scenario, there could be up to approximately 209 visitors on the roof garden area at one time on a peak weekend day.¹⁴ The noise levels generated by rooftop-related activities of approximately 209 people could be as high as 75 dBA at 3 feet from the boundary of the rooftop garden, assuming that 105 visitors would be talking simultaneously. Accounting for distance attenuation (minimum 41 dBA loss at R3 and 41 dBA loss at R4), the roof garden noise level would be 35

¹² The podium courtyard area is approximately 14,720 sf. The assembly area allowance in the Building Code is 15 sf/person. Thus, this courtyard area could accommodate approximately 981 people. However, with tables, chairs and benches provided during an event with that number of people, an estimate of approximately 491 people is provided, which assumes half of the space would be filled with furniture and/or other non-occupied space.

¹³ The open space noise levels of 50 dBA at R1, 52 dBA at R2, 44 dBA at R3 would be less than the existing ambient noise levels by more 9 or more dBA at these locations; therefore, it would not contribute an audible increase in the existing ambient noise levels at R1, R2, and R3. But open space levels of 54 at R4 would increase the noise level at sensitive receptor location R4 by 2.1 dBA. The noise level increase of 2.1 dBA at R4 would not exceed the significance threshold.

¹⁴ The roof garden area is approximately 6,260 sf. The assembly area allowance in the Building Code is 15 sf/person. Thus, approximately 417 people could potentially occupy this space. However, with tables, chairs and benches provided during an event with that number of people, an estimate of approximately 209 people is provided, which assumes half of the space would be filled with furniture and/or other non-occupied space.

dBA at the R1 noise sensitive receptors along Argyle Avenue, which would not exceed the significance threshold of 70 dBA, and 35 dBA at the R4 noise sensitive receptors along Carlos Avenue, which would not exceed the significance threshold of 61 dBA.¹⁵ Therefore, the podium courtyard operations would not result in a substantial increase in ambient noise levels, and impacts would be less than significant.

Section IV.1, *Noise*, of the Draft EIR concluded that the Level 4 pool deck, and other outdoor uses, including the rooftop spaces at Buildings 1 and 2 under the Project (which would be similar under Alternative 2), would also not generate noise levels that would exceed the significance thresholds at these sensitive receptors. As such, the Project, Alternative 2, and, in accordance with the Draft EIR analysis of the Project and Alternative and the analysis herein of the Modified Alternative 2, the Modified Alternative 2 would result in noise levels that do not create a substantial permanent increase in ambient noise levels in the vicinity of the Project Site. Thus, noise impacts associated with outdoor space under the Project, Alternative 2, and the Modified Alternative 2 would be less than significant and similar.

(b) Parking Structure

The Project, Alternative 2, and the Modified Alternative 2 would provide for structure parking. Noise levels can be increased at entrances due to entering and existing vehicles. Regarding vehicle parking, the Modified Alternative 2 proposes to provide a total of 414 spaces within a five-level Parking Podium and one below grade parking level at Building 1. Parking facilities would be accessed via a single driveway on Argyle Avenue. The Project and Alternative 2 would provide a three-level parking podium with two entrances, one on Argyle Avenue and one on Yucca Street, as well as a parking structure below Building 2 on Vista Del Mar Avenue. The Yucca Street and Vista Del Mar structure entrances are nearer to sensitive receptors than the structure entrance on Argyle Avenue.

The Modified Alternative 2 is forecasted to conservatively generate an anticipated 168 trips and 188 trips during the A.M. and P.M. peak hours, respectively, and not accounting for TDM reductions. The peak hour trips would almost all utilize at the west entrance driveway on Argyle Avenue to access the parking structure, with the exception of several trips allocated to the existing residences along Vista Del Mar. Using the FTA's reference noise level of 92 dBA SEL¹⁶ at 50 feet from the noise source for a parking lot, assuming the trip volumes mentioned previously, the noise levels would be approximately 49 dBA L_{eq} at 50 feet for the west entrance driveway on Argyle Avenue to access the parking structure. The west entrance driveway on Argyle Avenue to access parking is approximately 80 feet from noise-sensitive uses at sensitive receptor location R1, 140 feet from noise-sensitive uses at sensitive receptor location R2, and 230 feet from noise-sensitive uses at sensitive receptor location R4. Therefore, adjusting for these distances, the parking structure vehicle-related noise levels would be approximately 45 dBA L_{eq} at sensitive receptor location R1, 40 dBA L_{eq} at sensitive receptor location R2, and 36 dBA L_{eq} at sensitive receptor

¹⁵ The open space noise levels of 35 dBA at R1 and 35 dBA at R4 would be less than the existing ambient noise levels by more than 10 dBA at R1 and R4; therefore, it would not contribute an audible increase in the existing ambient noise level at R1 and R4.

¹⁶ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 4-13 and Table 4-14, pages 45 and 47, 2018.

location R4. These noise levels are well below the existing noise levels of 65 dBA L_{eq} , 61 dBA L_{eq} , and 56 dBA L_{eq} , respectively and which would not audibly increase the ambient noise level sensitive receptor locations at R1 and R2, or R4.¹⁷ The Project is forecasted to generate an anticipated 218 trips and 238 trips during the A.M. and P.M. peak hours, with its trips dispersed among three driveways. As a similar residential use to the Project (271 units), Alternative 2 would generate a similar level of daily and peak hour trips as under the Modified Alternative 2. As discussed in Draft EIR, Section IV.I, *Noise*, the Project's daily and peak hour vehicle trips would not increase ambient noise levels at the noise sensitive receptor locations R1, R2, R3, or R4 by the applicable 3 dBA or 5 dBA threshold, respectively, impacts would be less than significant. Noise impacts would be less under Alternative 2 and the Modified Alternative 2 because of fewer daily and peak hour vehicle trips. Moreover, because the Modified Alternative 2 would not locate parking structure entrances on Yucca Street or Vista Del Mar Avenue (R2 and R3) as under the Project and Alternative 2, impacts with respect to parking structure noise are determined to be reduced as compared to the Project and Alternative 2, and as such would be less than significant.

(iii) Loading Dock and Refuse Collection Areas

Loading, recycling, trash removal, and collection associated with the Project, Alternative 2, and the Modified Alternative 2's would occur in designated areas within the interior areas of the P1 Level near the parking entrance off Argyle Avenue. This location would minimize impacts to nearby residents.

Loading dock and refuse collection areas activities such as truck movements/idling and loading/unloading operations generate noise levels that have a potential to adversely impact adjacent land uses during long-term operations. Based on a noise survey that was conducted at a loading dock facility by ESA, loading dock activity (namely idling semi-trucks and backup alarm beeps) would generate noise levels of approximately 70 dBA L_{eq} at a reference distance of 50 feet from the noisiest portion of the truck (i.e., to the side behind the cab and in line with the engine and exhaust stacks).¹⁸

As with the Project and Alternative 2, the Modified Alternative 2's loading dock and refuse service areas would be located within the P1 level. The east side of the parking structure from Level P1 up to the Level 3 for the new building would have no openings. In addition, the south side of the exterior building wall from at least 50 feet as measured from the southeastern corner of the parking structure (towards the center of the Project Site) from the P1 Level up to Level 3 would also have no openings, in order to block the line of sight to the residential uses along the west side of Vista Del Mar Avenue. Based on a noise source level of 66 dBA at a reference distance of 80 feet for noise sensitive receptor R1, and a noise level of 60 dBA at a reference distance of 160 feet for noise sensitive receptor R4, accounting for barrier-insertion loss by the Project

¹⁷ The noise levels of 45 dBA at R1 and 40 dBA at R2 would be less than the existing ambient noise levels by more than 10 dBA at these locations; therefore, it would not contribute an audible increase in the existing ambient noise level at R1, R2 or R4.

¹⁸ The loading dock facility noise measurements were conducted at a loading dock facility at a Wal-Mart store using the Larson-Davis 820 Precision Integrated Sound Level Meter (SLM) in June 15, 2016. The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of approximately 5 feet above the local grade. See Appendix I for the supporting documents.

building (minimum 40 dBA insertion loss), the loading dock and refuse service noise levels would be approximately 26 dBA L_{eq} at the noise-sensitive uses represented by R1 and 20 dBA L_{eq} at noise-sensitive uses represented by R4, of which such levels would be inaudible because they would be at least 10 dBA below the existing ambient noise levels at R1 and R4, and therefore would not exceed the significance thresholds of 70 dBA at R1 and 61 dBA at R4, respectively. Respectively, the Project and Alternative 2 loading dock noise levels would not also not exceed established thresholds, and noise impacts related to loading docks would be similar and less than significant.

(a) Composite Noise Level Impacts from Proposed
Modified Alternative 2 Operations

Composite noise levels represent potential maximum Project-related noise level. An evaluation of the combined noise from the Modified Alternative 2's various noise sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum Modified Alternative 2-related noise level increase that may occur at the noise-sensitive receptor locations included in this analysis. As with the noise sources associated with the Project, the noise sources associated with Modified Alternative 2 would include traffic on nearby roadways, automobile movement noise in the parking structures, outdoor/open space noise, loading dock and refuse service areas, emergency generator, and on-site mechanical equipment. However, the Modified Alternative 2 is forecasted to generate 168 trips and 188 trips during the A.M. and P.M. peak hours, respectively, which is lower than the Project, which is forecasted to generate 2,218 total daily trips and 238 trips during the A.M. and P.M. peak hours, respectively. Thus, noise from traffic on nearby roadways would be reduced for the Modified Alternative 2 and Alternative 2 (having similar traffic levels as those of the Modified Alternative 2), as compared to the Project.

The maximum composite noise impacts would generally be expected near the Project Site boundary. As shown in **Table 3-4, *Unmitigated Composite Noise Levels at Sensitive Receptor Locations R1, R2, R3, and R4 from Modified Alternative 2 Operation***, the composite noise levels are dominated by the emergency generator, which would be located on the P1 level, approximately 75 feet from Argyle Avenue and along the southern perimeter of the Modified Alternative 2 building. The maximum composite noise impacts are expected to occur at noise-sensitive receptors at measurement locations R1 and R4. Location R1 represents uses located across Argyle Avenue that could experience composite noise from the Modified Alternative 2's emergency generator, Podium Courtyard (6th level), roof garden (30th level), and parking access as well as from traffic on Argyle Avenue. Location R4 represents uses located adjacent to the south of the Project Site that could experience composite noise from the Modified Alternative 2's emergency generator, Podium Courtyard (6th level), roof garden (30th level), and parking access as well as from traffic on Vista Del Mar and Carlos Avenue. Locations R2 and R3 to the north and east of the Project Site would be less affected by composite noise, even though they experience open space noise from the park space (2nd level), because the Modified Alternative 2 building would provide a buffer from composite noise from the emergency generator and also would be situated further away from the podium courtyard (for R3) and the parking access (for R2).

TABLE 3-4
UNMITIGATED COMPOSITE NOISE LEVELS AT SENSITIVE RECEPTOR LOCATIONS R1, R2, R3,
AND R4 FROM MODIFIED ALTERNATIVE 2 OPERATION

Operational Noise Sources	Noise Levels, dBA			
	Location R1	Location R2	Location R3	Location R4
(A) Existing (Ambient) Noise Level	65	61	58	56
Modified Alternative 2 Composite Noise Sources				
(1) Mechanical Equipment	55	51	48	46
(2) Outdoor/Open Space Activity	51 ^c	53 ^d	50 ^e	55 ^f
(3) Loading Dock and Refuse Collection Areas	26	N/A ^g	N/A ^g	20
(4) Parking Structures	45	40	N/A ^h	36
(5) Emergency Generator	80	46	40	78
(6) Off-site traffic ^a				
Estimated Project-only traffic noise level (peak Leq)	53.6	57.9	57.9	53.6
(B) Modified Alternative 2 Composite Noise Level (1+2+3+4+5+6)^b	80.0	60.0	58.9	78.0
(C) Existing Plus Modified Alternative 2 Composite Noise Level (A+B)^b	80.2	63.5	61.5	78.1
Project Increment (C-A)	15.2	2.5	3.5	22.1
Exceeds Threshold?	Yes	No	No	Yes

^a Traffic volumes and associated noise levels conservatively assumed to be the same for R4 as R1. The Modified Alternative 2 would result in lower traffic noise levels than the Project. However, for the purposes of this analysis, the Project traffic noise levels are used, which provides for a conservative analysis.

^b Noise levels are added logarithmically.

^c Noise levels are added logarithmically for the Level 6 podium courtyard (50 dBA) and the Level 30 roof garden (35 dBA).

^d Noise levels are added logarithmically for the Level 2 park space (45 dBA) and the Level 6 podium courtyard (52 dBA).

^e Noise levels are added logarithmically for the Level 2 park space (48 dBA) and the Level 6 podium courtyard (44 dBA).

^f Noise levels are added logarithmically for the Level 6 podium courtyard (54 dBA) and the Level 30 roof garden (35 dBA).

^g The Project would not have loading docks near location R2 and R3 and as such would not contribute to noise increases from loading docks at location R2 and R3.

^h The Modified Alternative 2 would not have parking structure entrances near location R3 and as such would not contribute to noise increases from parking structure activities at location R3.

SOURCE: ESA, 2020.

As shown in Table 3-4, the composite noise levels from the operation of the Modified Alternative 2 would be up to 80.2 dBA at sensitive receptor location R1, up to 63.5 dBA at sensitive receptor location R2, up to 61.5 dBA at sensitive receptor location R3, and up to 78.1 dBA at the sensitive receptor location R4, largely based on conservative noise levels from the emergency generator and conservatively using the Project-related peak hour traffic noise levels, even though peak hour traffic noise levels for the Modified Alternative 2 would be lower. The noise levels of mechanical equipment and loading dock and refuse collection areas was assumed to be the same between

the Project and the Modified Alternative 2 as the size and location of these noise sources are assumed to be similar between the Project, Alternative 2, and the Modified Alternative 2.

Overall, relative to the existing noise environment, the Modified Alternative 2 would be estimated to increase the ambient noise level by approximately 15.2 dBA at the residences to the west (R1) along Argyle Avenue, approximately 2.5 dBA to the hotel and residential uses to the north (R2) along Yucca Street, approximately 3.6 dBA to the residential uses to the east (R4) along Vista Del Mar, and by approximately 22.1 dBA at the residences to the south along Carlos Avenue (R4). The increase in unmitigated noise level at R2 and R3 would not exceed the significance threshold of an increase of 5 dBA but would be above the applicable increase of 5 dBA at R1 and R4. This analysis conservatively assumes that the Modified Alternative 2's operational noise sources would generate maximum noise levels simultaneously. Therefore, as with the Project and Alternative 2, the unmitigated composite noise level impact on sensitive receptors due to the Modified Alternative 2's future operations would be potentially significant and mitigation measures would be required.

Table 3-5, *Mitigated Composite Noise Levels at Sensitive Receptor Location R1 and R4 from Modified Alternative 2 Operation with Mitigation*, shows composite noise levels at the R1 and R4 locations after implementation of Mitigation Measure MM-NOI-5, which would reduce emergency generator-related noise levels to 55 dBA at the noise sensitive receptors (measurement location/sensitive receptor location R1) along Argyle Avenue and 53 dBA at the noise sensitive receptors (measurement location/sensitive receptor location R4) south of the Project Site, which are below the significance thresholds of 70 dBA for noise-sensitive receptors R1 and 61 dBA for noise-sensitive receptors R4. The mitigated composite noise levels from Modified Alternative 2 operation with the mitigated emergency generator noise levels would be up to 66.2 dBA for R1 and 60.6 dBA for R4. Overall, relative to the existing noise environment, the Modified Alternative 2 would be estimated to increase the ambient noise level by approximately 1.2 dBA at the residences to the west (represented by measurement location/sensitive receptor location R1) along Argyle Avenue and by 4.6 dBA at the residences to the south (represented by measurement location/sensitive receptor location R4). This increase in noise would be below the applicable thresholds involving increases of 5 dBA. These increases would be comparable to the Project's 1.1 dBA and 3.7 dBA at these same receptor locations. This analysis conservatively assumes that the Project's operational noise sources would generate maximum noise levels simultaneously. The roughly 1 decibel difference at R4 would not be a perceptible difference. Therefore, as with the Project and Alternative 2, the composite noise level impacts on sensitive receptors due to the Modified Alternative 2's future operations would be less than significant with mitigation, with impacts being similar.

It should be noted the analysis of open space noise included in the composite noise analysis is extremely conservative as it assumes all persons speaking would be located at the closest edge of the open space area to the noise sensitive receptor locations. In reality, people would be located throughout the open space area and not concentrated in any one particular area. Thus, open space noise levels and the resulting composite noise levels at the noise sensitive receptor locations would be substantially lower than disclosed herein.

TABLE 3-5
COMPOSITE NOISE LEVELS AT SENSITIVE RECEPTOR LOCATION R1 AND R4
FROM MODIFIED ALTERNATIVE 2 OPERATION WITH MITIGATION

Operational Noise Sources	Noise Levels, dBA	Noise Levels, dBA
	Location R1	Location R4
(A) Existing (Ambient) Noise Level	65	56
Modified Alternative 2 Composite Noise Sources		
(1) Mechanical Equipment	55	46
(2) Outdoor/Open Space Activity	51	55
(3) Loading Dock and Refuse Collection Areas	26	20
(4) Parking Structures	45	36
(5) Emergency Generator	55	53
(6) Off-site traffic ^a		
Estimated Project-only traffic noise level	53.6	53.6
(B) Modified Alternative 2 Composite Noise Level (1+2+3+4+5+6) ^a	60.0	58.8
(C) Existing Plus Modified Alternative 2 Composite Noise Level (A+B)	66.2	60.6
Project Increment (C-A)	1.2	4.6
Exceeds Threshold?	No	No

^a Traffic volumes and associated noise levels conservatively assumed to be the same for R4 locations as for R1 locations. The Modified Alternative 2 would result in lower traffic noise levels than the Project. However, for the purposes of this analysis, the Project traffic noise levels are used, which provides for a conservative analysis.

^b Noise levels are added logarithmically.

^c With the implementation of MM-NOI-4, emergency generator noise levels of up to 80 dBA at R1 locations and 78 dBA at R4 locations would be reduced to 55 dBA and 53 dBA, respectively.

SOURCE: ESA, 2020.

(j) Population and Housing

The Project, Alternative 2, and the Modified Alternative 2 would increase population, housing, and employment, as well as result in the temporary displacement of tenants currently occupying the Project Site's existing 44 residential units. Alternative 2 would provide 271 new residential units, and generate approximately 552 new residents¹⁹ (659 minus 107 existing residents) and 14 new employees,²⁰ compared to the Project, which would provide 210 new residential units and generate approximately 403 new residents (510 minus 107 existing residents). The Modified Alternative 2 would provide 269 new residential units in Building 1. Once 1765 N. Vista Del Mar

¹⁹ Based on the citywide household size of 2.43 persons per household.

²⁰ As with the Draft EIR, the employee generation factor for commercial uses is taken from the Los Angeles Unified School District, Developer Fee Justification Study, March 2017. As a separate rate is not provided for restaurant uses, the retail factor was used. The rate is for Neighborhood Shopping Centers.

has been returned to a single-family residence from a duplex with an additional apartment over its garage, it together with the single-family residence at 1771 N. Vista Del Mar will provide the Modified Alternative 2's additional two units. Therefore, although the total number of units (271) under the Modified Alternative 2 would be the same for Alternative 2 and the Modified Alternative 2, Modified Alternative 2 would provide only 269 new residential units. Therefore, as Alternative 2 would result in 552 new residents, and a net increase of total of 271 units, the Modified Alternative 2 would result in a net increase of approximately 550 new residents. This would be a minimal difference given the broad factors on which occupancy of residential units is based.

With demolition of the existing 44 units, Alternative 2 would result in the net increase of 227 residential units. Because ultimately two existing residential units on Vista Del Mar Avenue would remain under the Modified Alternative 2, with demolition of 42 residential units, the Modified Alternative 2 would also result in the net increase of 227 new residential units.

Although not a CEQA issue, the City notes that Alternative 2 would be consistent with the City's RSO requirements. The Modified Alternative 2 would provide 252 RSO units and 17 covenanted affordable units at the Very Low Income level. Alternative 2 and the Modified Alternative 2 would both represent a net increase in RSO units compared to existing conditions and to the Project.

The Project, Alternative 2, and the Modified Alternative 2's impacts with respect to inducing direct or indirect substantial population growth would be less than significant because they would be consistent with the Southern California Association of Governments (SCAG) growth projections, and would help the City meet its housing obligation under the applicable state Regional Housing Needs Assessment ("RHNA") allocation. The Project, Alternative 2 and Modified Alternative 2 would also provide the type of transit-oriented development encouraged in the General Plan Housing Element and SCAG RTP/SCS policies. The net increase of dwelling units under the Project, Alternative 2, and the Modified Alternative 2 represents a small fraction of the housing growth expected Citywide and the small number of units removed would not result in the displacement of a substantial number of existing housing such that the construction of replacement housing elsewhere would be required, particularly as the Project, Alternative 2, and Modified Alternative 2 would result in a substantial net increase of RSO and affordable housing units. As such, the Project, Alternative 2, and the Modified Alternative 2 would have less than significant population and housing impacts. However, the Modified Alternative 2 would meet the objectives of the General Plan Housing Element and SCAG RTP/SCS to provide housing for a range of income levels to a greater degree than the Project, as it would provide units for Very Low Income households. As such, impacts with respect to population and housing would be reduced by the Modified Alternative 2 in comparison to the Project or Alternative 2.

(k) *Public Services*

(i) *Fire Protection*

The Project, Alternative 2, and the Modified Alternative 2 would require construction activities and intensify the use of the Project Site that would increase demand on fire protection and emergency medical services. As was evaluated for the Project, the Project Site is well served by nearby fire stations with adequate ability to serve the site as well as sufficient hydrant water flow to meet the

fire-fighting requirements established by the LAFD. The Project, Alternative 2, and the Modified Alternative 2's building design and site layout would be reviewed by LAFD and would be required to provide sufficient accessibility for fire-fighting activities in accordance with Fire Code requirements. The Project, Alternative 2, and the Modified Alternative 2 would comply with regulatory measures for safety and would provide additional voluntary provisions for addressing emergency situations with on-site equipment and personnel. The Project, Alternative 2, and the Modified Alternative 2 would implement PDF-TRAF-1 to provide a Construction Management Plan to improve access around the Project Site during construction. PDF-FIRE-1, implemented under the Project, Alternative 2 and the Modified Alternative 2, would facilitate occupants' voluntary fire and emergency medical procedures during operation that would reduce demand on the LAFD. The Project, Alternative 2, and the Project would comply with Fire Code regulations related to mixed residential and commercial uses and high-rise buildings. With the implementation of PDF-TRAF-1 PDF-FIRE-1, and applicable regulations, the Project, Alternative 2, and the Modified Alternative 2 would not increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, the Project, Alternative 2, and the Modified Alternative 2 would not result in potential physical impacts associated with the construction of fire facilities. Therefore, impacts with respect to fire protection would be less than significant.

(ii) Police Protection

The ratio of officers to residential population is used by LAPD as an indicator of the level of service offered and serves as a basis for measuring the increase in policing required for a project. Alternative 2 would result in a net increase in LAPD service population of 696,²¹ while the Modified Alternative 2's net service population increase would be 705 persons, compared to a net increase in the LAPD service population of 740 under the Project. Alternative 2 and the Modified Alternative 2 would generate an increase in population from 165,000 residents to 165,696 and 166,705 persons, respectively, in the Hollywood Community Police Station service area. Both Alternative 2 and the Modified Alternative 2 would reduce the officer to resident ratio from one officer per 468 residents to one officer per 470 residents, based on 352 sworn officers. With a generation factor of 16 crimes per 1,000 residents, Alternative 2 and the Modified Alternative 2 could potentially result in approximately 11 additional crimes per year (notwithstanding proposed PDFs), compared to 12 crimes per year under the Project. The Project, Alternative 2, and the Modified Alternative 2 would all implement PDF-POL-1 to increase security and reduce vandalism during construction. The Project, Alternative 2, and the Modified Alternative 2 would all implement PDF-POL-2 through PDF-POL-5, to provide 24-hour security personnel and cameras, design landscaping to not impede visibility, require participation in community crime prevention efforts, and provide building diagrams to the LAPD. Implementation of these measures would reduce Alternative 2 and the Project's demand on police services. With implementation of PDFs, the Project, Alternative 2, and the Modified Alternative 2 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, the Project, Alternative 2, and the Modified Alternative 2 would not result in potentially significant physical impacts associated with

²¹ Based on City CEQA Thresholds Guide, K. Police Service Population Conversion Factors of 3 persons per residential unit (227-unit net increase), 3 persons/1,000 sf of commercial/restaurant (5,120 sf).

construction of police facilities. Therefore, impacts with respect to police protection would be less than significant under the Project, Alternative 2, and the Modified Alternative 2. However, because Alternative 2 and the Modified Alternative 2 would generate less net new service population than under the Project (the basis for LAPD officer/resident service ratio), impacts with respect to police protection services would be less under the Modified Alternative 2 and Alternative 2 than the Project.

(iii) Schools

The Project, Alternative 2, and the Modified Alternative 2 would generate a net increase in school age children. The Modified Alternative 2 and Alternative 2's 271 residential units are anticipated to generate approximately 81 school age children²² and the Project's 210 residential units would generate a net increase of approximately 52 new school age children. The additional students from the Project or Alternative 2 would attend local schools and have the potential to exceed the number of available seats at local schools. However, pursuant to Section 65995 of the California Government Code, the applicant would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project Site are at capacity or not and, pursuant to Section 65995(h), payment of such fees is deemed to be full mitigation of a project's development impacts. As such, impacts to school facilities and services would be less than significant under the Project, Alternative 2, and the Modified Alternative 2.

(iv) Parks and Recreation

The Project, Alternative 2, and the Modified Alternative 2 would generate new residents, who would increase demand for parks and recreational facilities. Both the Project and Alternative 2 would incorporate open space in excess of LAMC standards, including the podium courtyard, which would be equipped with lounge seats, a gaming lounge, gas fire pit and lounge, BBQ, and dining tables and chairs; indoor recreational amenities; and roof top garden and pool deck. The Modified Alternative 2 would increase the Project's open space from 24,350 square feet to 30,400 square feet. The open space would include a 2,820-square-foot publicly-accessible park at the corner of Vista Del Mar Avenue and Yucca Street; approximately 14,720-square-feet of open space, including a swimming pool, seating and landscaping would be provided at the top of the 5-level podium at Level 6; and a 6,260-square-foot roof garden and swimming pool on the top level of new building, Level 30. Due to the amount, variety, and availability of the open space and recreational amenities under both the Project, Alternative 2, and the Modified Alternative 2, it is anticipated that residents would generally utilize on-site open space to meet their recreational needs in manner that would reduce demand on local parks. The Project, Alternative 2, and the Modified Alternative 2 would comply with LAMC Section 21.10.3 regarding a dwelling unit construction fee of \$200 for each new residential unit for City acquisition of new park space. Furthermore, the Project, Alternative 2, and the Modified Alternative 2 would meet the applicable

²² Student generation rates for multi-family units are 0.1999 elementary students per unit, 0.0546 middle school students per unit, and 0.0943 high school students per unit for high school students. Respectively, Alternative 2 (271 units) would generate 54 elementary school students, 15 middle school students, and 25 high school students for an estimated total of 94 students. Subtracting the Project Site's estimated existing students (13), the net total would be 81 students.

requirements set forth in LAMC Sections 12.21 and 17.12, and 21.10.3(a)(1) regarding the provision of useable open space and parkland requirements. Although the Project, Alternative 2, and the Modified Alternative 2 would not meet the parkland provision goals set forth in the Public Recreation Plan, these are Citywide goals and are not intended to be requirements for individual development projects. Thus, the Project, Alternative 2, and the Modified Alternative 2 would not exacerbate the existing shortfalls in parkland relative to City standards to the extent that new or physically altered park or recreational facilities would need to be constructed, the construction of which would cause significant adverse physical environmental impacts. Impacts with respect to parks and recreation would be less than significant. However, because the Project would generate less new population, impacts with respect to parks and recreation services would be less for the Project than under Alternative 2 and the Modified Alternative 2.

(v) *Libraries*

The Project, Alternative 2, and the Modified Alternative 2 would increase demand for library services. However, all of the residential units under the Project, Alternative 2, and the Modified Alternative 2 would be equipped to use individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. In addition, the Project, Alternative 2, and the Modified Alternative 2 would all generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents. Based on the above, target service populations, and library sizing standards, operation of the Project, Alternative 2, and the Modified Alternative 2 would not create any new exceedance of the capacity of local libraries to adequately serve the proposed residential population. Therefore, neither the Project, nor Alternative 2, nor Modified Alternative 2 would create the need for new or physically altered library facilities, the construction of which would result in substantial adverse physical environmental impacts, in order to maintain acceptable service ratios or objectives. However, because the Project would generate less new population, impacts with respect to library services would be less for the Project than under Alternative 2 and the Modified Alternative 2.

(l) *Transportation*

The following discussion of Project impacts is based on the *Alternatives Analysis Memorandum*, dated February 8, 2020, prepared by Gibson Transportation Consulting, Inc., which is provided in Appendix L-3 of the Draft EIR and the *Modified Alternative 2 Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California*, dated June 30, 2020, prepared by Gibson Transportation Consulting, Inc., which is provided in Appendix C-4 of this Final EIR.

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

The Project, Alternative 2, and the Modified Alternative 2 would support multimodal transportation options and a reduction in VMT per resident/employee, as well as promote transportation-related

safety in the Project area. The Project and Alternative 2 would not conflict with policies of Mobility Plan 2035 adopted to protect the environment and reduce VMT. The Project, Alternative 2, and the Modified Alternative 2 would also be consistent with applicable transportation goals of the Hollywood Community Plan to coordinate land use densities and to promote the use of transit. Mitigation Measure TRAF-1 under the Project, Alternative 2, and the Modified Alternative 2 would implement a TDM Program to address trip reduction and use of alternate modes of transportation. The Project, Alternative 2, and the Modified Alternative 2 would not conflict with VisionZero to reduce traffic-related deaths or with Los Angeles Department of Transportation (LADOT) MPP, Section 321, regarding driveway design standards. The Project, Alternative 2, and the Modified Alternative 2 would increase population density in close proximity to the Metro Red Line Hollywood/Vine Station, other regional Metro bus lines, and the LADOT DASH lines. As with the Project, Alternative 2 and the Modified Alternative 2 would include bicycle parking spaces for residents, employees, and visitors. The Project, Alternative 2, and the Modified Alternative 2 would also provide for pedestrian improvements, including streetscape and lighting improvements along the street frontages, which would enhance pedestrian safety. The Project, Alternative 2, and the Modified Alternative 2 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant and similar under the Project, Alternative 2, and the Modified Alternative 2. In addition, in accordance with LADOT's Interim Guidance for Freeway Safety Analysis (City Freeway Guidance), neither the Project nor Modified Alternative 2 generates more than 25 peak hour trips at any freeway offramp, and thus neither the Project nor Modified Alternative 2 requires a further safety analysis with respect to Caltrans facilities (See Final EIR, Appendix C-3b).

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

The Modified Alternative 2 was analyzed for potential VMT impacts using the same methodology as in the Draft EIR, which utilized the LADOT's VMT Calculator Version 1.2. **Table 3-6, VMT Analysis Summary – Modified Alternative 2**, below, illustrates the daily VMT before and after implementation of TDM strategies (Mitigation Measure MM-TRAF-1).

As shown in Table 3-6, the Modified Alternative 2 would generate approximately 8,460 VMT per day (7,476 VMT after mitigation) compared to Alternative 2, which would generate 7,514 VMT per day (6,663 after mitigation), both of which would be substantially less than under the Project, which would generate 12,607 VMT per day (11,929 VMT after mitigation).^{23,24} The Modified Alternative 2, as with Alternative 2, would generate an average per capita household VMT of 7.5, prior to mitigation. The Project would generate an average household per capita VMT of 7.4. These figures exceed the applicable Central APC impact threshold of 6.0 and, therefore, would result in a potentially significant VMT impact related to per capita household trips. The Project would generate an average work VMT

²³ Table V-3, VMT Analysis Summary – Alternative 2, on page V-49 of the Draft EIR provides VMT data on Alternative 2.

²⁴ Table IV.L-4, Post-Mitigation Vehicle Miles traveled, on page IV.L-45 of the Draft EIR provides VMT data on the Project.

per employee of 7.2, Alternative 2 would generate an average work VMT per employee of 4.1, and the Modified Alternative 2 would generate an average work VMT of 5.0 per employee, all of which would be less than the applicable Central APC per employee impact threshold of 7.6.²⁵

TABLE 3-6
VMT ANALYSIS SUMMARY – MODIFIED ALTERNATIVE 2

Alternative Land Uses	Size	
Multi-Family Housing	269 units	
Restaurant	7,760 square feet	
Analysis ^a		
Resident Population	606	
Employee Population	31	
Project Area Planning Commission	Central	
Project Travel Behavior Zone	Compact Infill (Zone 3)	
	Modified Alternative 2 before Mitigation	Modified Alternative 2 with Mitigation ^c
Daily VMT ^b	8,460	7,476
Home-Based Production VMT ^d	4,541	3,573
Home-Based Work Attraction VMT ^e	155	154
Household VMT per capita ^f	7.5	5.9 [d]
Impact Threshold	6.0	6.0
Significant Impact	YES	NO
Work VMT per Employee ^g	5.0	5.0
Impact Threshold	7.6	7.6
Significant Impact	NO	NO

NOTES:

- a Alternative Analysis is from VMT Calculator output reports provided in the *Modified Alternative 2 Analysis for the 6220 Yucca Street Mixed-Use Project Hollywood, California*, which is in Appendix C-4 of this Final EIR.
- b Total daily VMT is the generated total VMT by all trips, regardless of trip purpose, to and from the Project Site.
- c The Modified Alternative 2 would require an increase in the cost of unbundled parking compared with the Project in order to reduce the impact to a less-than-significant level.
- d Home-Based Production VMT are one-way trips to a workplace destination originating from a residential use at the Project Site.
- e Home-Based Work Attraction VMT are one-way trips to a workplace destination at the Project Site originating from a residential use.
- f Household VMT per capita is the total Home-Based VMT productions divided by the residential population of the project.
- g Total population or trip count below VMT Calculator screening criteria. Result was manually calculated using component VMT and population data above.

SOURCE: City of Los Angeles VMT Calculator and VMT Calculator User Guide; Gibson Transportation Consulting, 2020.

²⁵ Gibson Transportation Consulting based all VMT calculations on the City of Los Angeles VMT Calculator Version 1.2 and VMT Calculator User Guide.

As with the Project and Alternative 2, the Modified Alternative 2 would implement a TDM Program under MM-TRAF-1. Following implementation of MM-TRAF-1, Alternative 2 and the Modified Alternative 2 would both generate a per capita household VMT of 5.9, which is under the impact threshold. As such, MM-TRAF-1 would reduce the VMT impact to below the level of significance. Under the Project, the household VMT would be to 6.0 VMT per capita after mitigation. With mitigation, VMT impacts under the Project, Alternative 2, or the Modified Alternative 2, when considering both household VMT per capita and work VMT per employee, would be less than significant. The household VMT per capita (the primary source of vehicle trips) under the Modified Alternative 2 and Alternative 2 would be similar and less than under the Project. Therefore, VMT impacts would be less under the Modified Alternative 2 and Alternative 2 than under the Project.

Subsequent to the release of the Draft EIR in April 2020, in May 2020 LADOT released version 1.3 of the VMT Calculator. The update incorporated the latest available data, and included adjustments to trip length averaging, transit mode splits, and trip purpose splits to better match the VMT Calculator with the City's Travel Demand Forecasting Model on which it is based. When analyzing the Modified Alternative 2 using version 1.3 of the VMT Calculator, the Modified Alternative 2 would have household VMT per capita of 5.1 and work VMT per capita of 6.7, both under the applicable significance thresholds, before the implementation of the Modified Alternative 2's TDM program. Based on this supplemental information, MM-TRAF-1 would not be required to reduce VMT impacts below the level of significance. Nonetheless, the Modified Alternative 2 would implement MM-TRAF-1 to minimize the effects of Modified Alternative 2 VMT and help meet City goals regarding VMT and emissions reduction, as well as supporting the use of multi-modal transportation.

(iii) Design Hazards

The Project, Alternative 2, and the Modified Alternative 2 would reduce existing curb cuts and provide new sidewalks around the perimeter of the Project Site. Total existing curb cuts would be reduced from five to a total of three, associated with parking structure entrances, under the Project and Alternative 2. However, the Modified Alternative 2 would have one parking structure entrance (on Argyle Avenue), which would reduce the curb cuts to one. None of the driveways would require the removal or relocation of existing passenger transit stops, and all driveways would be designed and configured to avoid potential conflicts with transit services and pedestrian traffic. The Project, Alternative 2, and the Modified Alternative 2 would not substantially increase hazards, vehicle/pedestrian conflict, or preclude City action to fulfill or implement projects associated with these networks. They would also contribute to overall walkability through enhancements to the Project Site and streetscape and would not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Impacts would be less than significant under the Project, Alternative 2, and the Modified Alternative 2. However, because the Modified Alternative 2 would reduce vehicle access to a single new driveway impacts would be less than under the Project and Alternative 2.

(iv) Emergency Access

The Project Site is located in an established urban area served by the surrounding roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Drivers of

emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation of the Project, Alternative 2, and the Modified Alternative 2. All driveways and the internal circulation would be subject to LAFD review to confirm adequate access is provided internally for on-site emergency vehicle access. In addition, the Project, Alternative 2, and Modified Alternative 2 would incorporate a Construction Traffic Management Plan as described in PDF-TRAF-1 and Pedestrian Safety Plan (PDF-TRAF-2) to further ensure that adequate emergency access is provided during construction. With review and approval of Project Site access and circulation plans by the LAFD, the Project, Alternative 2, and the Modified Alternative 2 would not impair implementation of, or physically interfere, with adopted emergency response or emergency evacuation plans. Impacts regarding emergency access would be less than significant and similar under the Project, Alternative 2, and the Modified Alternative 2.

(m) Tribal Cultural Resources

The City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC for the Archaeological and Paleontological Resources Assessment indicated no known Tribal cultural resources within the Project Site or surrounding area. However, excavations associated with the Project, Alternative 2, and the Modified Alternative 2 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. In the unlikely event that buried tribal cultural resources are encountered during construction, the Project Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent tribal cultural resource discoveries. The Project and Alternative 2 require the same scale of site preparation and surface grading and, as such, would have similar opportunity to uncover any potential Tribal cultural resources. The Modified Alternative 2 would substantially reduce excavation compared to the Project and Alternative 2 because of the reduction in subterranean parking and the elimination excavation associated with Building 2. Compliance with the City's standard Conditions of Approval would ensure that the Project, Alternative 2, and the Modified Alternative 2 would result less than significant impacts with respect to Tribal cultural resources. However, because the Modified Alternative 2 would reduce ground disturbance and excavation, its impacts would be reduced as compared to either the Project or Alternative 2.

(n) Utilities and Service Systems – Water, Wastewater, Solid Waste

(i) Water Supply

The Project, Alternative 2, and the Modified Alternative 2 would generate demand for the water resources. As shown in **Table 3-7, Estimated Domestic Water Demand – Modified Alternative 2**, the Modified Alternative 2 would require approximately 30,820 gallons per day (gpd) or 33.16 acre feet per year (AFY).

TABLE 3-7
ESTIMATED DOMESTIC WATER DEMAND - MODIFIED ALTERNATIVE 2

Land Use	Quantity	Factor (gpd)^a	Wastewater Generation (gpd)	Annual Water Demand (AFY)^b
Existing Uses				
Residential Single-Family	1 unit	185 /du	185	0.25
Residential Multi-Family	2 units	150 /du	300	0.40
Residential: Apartment – Bachelor	1 unit	75 /du	75	0.10
Residential: Apartment 1-Bedroom	26 units	110 /du	2,860	3.85
Residential: Apartment 2-Bedroom	14 units	150 /du	2,100	2.82
Parking/Asphalt/Hardscape Areas ^c	28,000 sf	20 /1,000 sf	560	0.75
Total			6,080	8.17
Proposed Uses				
Residential Studio Apartment	21 units	75/du	9,075	10.17
Residential: Apartment – 1 Bedroom	128 units	110/du	14,080	15.77
Residential: Apartment – 2 Bedroom	110 units	150/du	16,500	18.48
Residential: Apartment – Suite (2 bedroom)	10 units	190/du	1,900	2.13
Single Family Residence	2 units	185/du	370	0.41
Restaurant/Retail/Commercial	7,760 sf	0.05/sf	388	0.43
Parking Structure	190,605 sf	20 /1,000 sf	3,812	4.27
Subtotal			46,125	51.66
<i>Less Additional Conservation (20%)^d</i>			-9,225	-10.33
Total			36,900	41.33
Net Increase (Proposed minus Existing)			30,820	33.16

Note: DU. = dwelling unit; SF = square feet; gpm = gallons per minute; gpd = gallons per day; AFY = acre feet per year.

a Wastewater generation factors obtained from *6220 Yucca Street – Request for Wastewater Services Information*, prepared by City of Los Angeles, LA Sanitation, Wastewater Engineering Services Division, dated July 7, 2017 and based on Los Angeles Department of Public Works, Bureau of Sanitation, Sewerage Facilities Charge Sewage Generation Factor for Residential and Commercial Categories, dated April 6, 2012.

b An acre-foot equals approximately 325,851 gallons

c 18,000 square feet of parking/asphalt area and 10,000 square feet of hardscape area.

d Estimated 20 percent water use reduction due to additional water conservation commitments agreed by

TABLE 3-7
ESTIMATED DOMESTIC WATER DEMAND - MODIFIED ALTERNATIVE 2

Land Use	Quantity	Factor (gpd) ^a	Wastewater Generation (gpd)	Annual Water Demand (AFY) ^b
the Project applicant: installation of waterless urinals; 1.75 gpm for shower heads; drought tolerant, low water use landscape system including drip, bubblers, and weather-based controller; and installation of turf where feasible. The parking structure is excluded from this reduction as water conservation measures do not apply.				
SOURCE: ESA, 2020.				

Alternative 2 would require approximately 25,024.8 gpd or approximately 26.67 AFY. These estimates do not account for on-site swimming pools, which would increase total demand, but only nominally on a daily basis. In contrast, the Project would increase on-site water demand by approximately 62,995 gpd or approximately 67.13 AFY.²⁶ The difference between the Project, Alternative 2, and the Modified Alternative 2 is the result of the elimination of the hotel use (a high water consumer) and reduction restaurant floor area under Alternative 2 and the Modified Alternative 2. The Modified Alternative 2 would have a slightly higher water demand because of increase in retail/restaurant floor area as compared to Alternative 2 (7,760 square feet under the Modified Alternative 2 compared to 5,120 square feet under Alternative 2) and the retention of the single-family homes on Vista Del Mar Avenue, which have greater water demand than multi-family residences. The water supply analysis for the Project indicates that LADWP has sufficient water supply to meet the Project's needs. Because the Modified Alternative 2 and Alternative 2 would substantially reduce the Project's water demand, LADWP would also have sufficient supply for the Modified Alternative 2 and Alternative 2. As with the Project, the Modified Alternative 2 and Alternative 2 would include design features to reduce the demand for water consumption. Water infrastructure and water supply would be sufficient to meet the demands of the Project, Alternative 2, and the Modified Alternative 2 without mitigation and, as such, the Project, Alternative 2, and the Modified Alternative 2 would have a less than significant impact with respect to water services. The Modified Alternative 2 and Alternative 2 would result in a lower level of water demand than that of the Project.

(ii) Wastewater

The Project, Alternative 2, and the Modified Alternative 2 would increase wastewater generation over existing conditions; thus, increasing demand on the existing Hyperion Treatment Conveyance System or Hyperion Treatment Plant. The Project is estimated to increase on-site wastewater generation by approximately 62,995 net gpd (69,075 gpd under the Project minus 6,080 gpd generated by existing uses).²⁷ The Project's additional wastewater generation would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. Wastewater generation under Alternative 2 would be within the limits of its water demand of 25,024.8 gpd, or less than half of the wastewater generated by the Project (see Table V-4 in the

²⁶ See Table IV.N.1-8, *Estimated Domestic Water Demand for Project*, in Section IV.N.1 of this Draft EIR.

²⁷ See Table IV.N.1-7, *Wastewater Generated During Operation*, in Section IV.N.1 of this Draft EIR.

Draft EIR). Although the Modified Alternative 2 would produce slightly more wastewater than Alternative 2 because of the retained single-family uses and more retail/restaurant floor area than under Alternative 2 (7,760 square feet under the Modified Alternative 2 compared to 5,120 square feet under Alternative 2), the Modified Alternative 2 would still substantially reduce the wastewater demand to approximately 30,820 gpd as compared to the Project. Because the existing Hyperion Treatment Conveyance System and Hyperion Treatment Plant have adequate capacity to serve the Project, it would also have sufficient capacity to serve Alternative 2, and the Modified Alternative 2. Impacts with respect to wastewater treatment and conveyance under the Project, Alternative 2, and the Modified Alternative 2 would be less than significant. However, the Modified Alternative 2 and Alternative 2 would generate substantially less wastewater than the Project.

(iii) Solid Waste

The Project, Alternative 2, and the Modified Alternative 2 would all increase demand for solid waste disposal as compared to current conditions on the Project Site. The Project and Alternative 2 would require the same demolition and similar scale of construction activity, both of which would be slightly decreased by the Modified Alternative 2, which would not require the demolition of the two existing residences on Vista Del Mar Avenue. Both the Project and Alternative 2 would generate approximately 3,307 tons of C&D waste associated with demolition and 1,001 tons of C&D waste associated with building construction, for a total of 4,308 tons of C&D waste. This total would be somewhat less under the Modified Alternative 2. The total C&D waste would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with construction under the Project, Alternative 2, and the Modified Alternative 2 would be similar and less than significant.

As shown in **Table 3-8**, *Estimated Operational Solid Waste Generation – Modified Alternative 2*, the Modified Alternative 2 would generate 2,815.13 pounds per day and 513.74 tons per year. Based on Citywide diversion rates of at least 76.4 percent, the Modified Alternative 2's solid waste generation would be reduced to 664.37 pounds per day and 121.24 tons per year.²⁸

Alternative 2 would result in a similar waste generation of 2,801.93 pounds per day and 511.33 tons per year, with a reduction through diversion rates to 661.26 pounds per day and 120.67 tons per year.²⁹ This would be substantially more than the Project's diverted 622 pounds per day and 113.55 tons per year of solid waste.³⁰ The Project's annual solid waste generation also would be approximately 0.001 percent of the County's annual waste generation and would account for less than 0.0001 percent of the remaining capacity.³¹ With diversion, the Modified Alternative 2's annual solid waste generation would also be less than 0.001 percent of the County's annual waste generation and 0.0001 percent of the remaining capacity. Because of the small increase in waste

²⁸ See Table IV.N.1-11, *Estimated Operational Solid Waste Generation*, in Section IV.N.1 of this Draft EIR.

²⁹ See Table V-5, *Alternative 2 Estimated Operational Solid Waste Generation*, on page V-54 in the Draft EIR.

³⁰ See Table IV.N.1-11, *Estimated Operational Solid Waste Generation*, on page IV.N.1-66 in the Draft EIR.

³¹ The estimated Los Angeles County annual disposal rate is estimated to be 9.457 million tons per year and the remaining capacity is estimated to be 114 million tons.

disposal represented by the Project, Alternative 2, and the Modified Alternative 2, none would exceed the permitted capacity of disposal facilities serving the Project Site, and none would alter the ability of the County to address landfill needs via existing capacity and other planned strategies and measures for ensuring sufficient landfill capacity exists to meet the needs of the County. As such, impacts with respect to solid waste generation would be less than significant, with impacts slightly greater under the Modified Alternative 2 and Alternative 2 than under the Project.

TABLE 3-8
ESTIMATED OPERATIONAL SOLID WASTE GENERATION – MODIFIED ALTERNATIVE 2

Land Use	Quantity (units/sf)	Factor^a	Solid Waste Generation (lbs/day)	Solid Waste Generation (tons/year)
Existing Land Uses				
Residential				
(43 multi-family + 1 single-family)	44 units	12.23 lbs/unit ^b	538	98.19
Total			538	98.19
Proposed Land Uses				
Residential	271 units	12.23 lbs/unit	3,314.33	604.85
Restaurant/Retail	7,760 sf	5 lbs./1,000 sf/day	38.8	7.08
Total			3,353.13	611.93
Net Increase (Proposed minus Existing)			2,815.13	513.74
Net Increase (Post-diversion)^c			664.37	121.24

NOTE: sf = square feet; lbs. = pounds.

^a Generation factors provided by CalRecycle at: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>. Accessed January 2019.

^b Generation factor provided applies to both single-family residential and multi-family residential.

^c Based on an anticipated diversion rate of 76.4 percent for operations.

SOURCE: ESA, 2020.

(o) *Utilities and Service Systems – Energy Infrastructure*

The Project, Alternative 2, and the Modified Alternative 2 would utilize energy infrastructure to accommodate their respective demand for energy resources. Similar to the Project and Alternative 2, the Modified Alternative 2's electricity and natural gas demands are expected to represent a small fraction of LADWP and SoCalGas energy supplies and the service provider's existing infrastructure. Planned electricity and natural gas supplies would be sufficient to meet the Project's demand for electricity and natural gas. As with the Project, Alternative 2 and the Modified Alternative 2 would not result in an increase in demand for electricity or natural gas services that exceeds available supply or distribution infrastructure capabilities that could result in the

construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Similar to the Project and Alternative 2, impacts with respect to the relocation or expansion of energy infrastructure under the Modified Alternative 2 would be less than significant. As existing off-site energy infrastructure would accommodate energy demand under the Modified Alternative 2, impacts would be similar to those of the Project and Alternative 2 and less than significant.

(2) Environmentally Superior Alternative

As discussed in subsection (1) Environmental Impacts, above, the Modified Alternative 2, similar to Alternative 2 presented in the Draft EIR, would reduce many of the Project's less than significant impacts (including impacts that are less than significant with mitigation). However, it is acknowledged that Modified Alternative 2, as with Alternative 2, would increase the Project's less than significant impacts on schools, libraries, parks/recreational facilities, and solid waste, although its impacts in those areas would be less than significant. Modified Alternative 2, similar to Alternative 2, would also reduce the duration of the Project's significant and unavoidable short-term construction noise and groundborne vibration and groundborne noise (human annoyance) impacts, but would not reduce these impacts to less than significant levels. Table V-13, *Comparison of Impacts Associated with the Alternatives and the Project*, in Chapter V of the Draft EIR compares impacts of Alternative 2 to the Project. The impact comparison conclusions for Modified Alternative 2 would be the same as Alternative 2 with the following exceptions:

- Historic Resources: The impacts of Alternative 2 are similar to the Project. Such impacts would be reduced under Modified Alternative 2
- Design Hazards: The impacts of Alternative 2 are similar to the Project. Such impacts would be reduced under Modified Alternative 2
- Tribal Cultural Resources: The impacts of Alternative 2 are similar to the Project. Such impacts would be reduced under Modified Alternative 2

Chapter V of the Draft EIR also includes Table V-14, *Ability of Alternatives to Meet Project Objectives*, which illustrates the ability of Alternative 2 to meet the Project Objectives. As shown in Table V-14, Alternative 2 would partially or fully meet all of the Project objectives, including the concentration of high-density housing in a TPA. Modified Alternative 2 would meet the Project Objectives in a similar manner to Alternative 2 as presented in Table V-14.

Chapter V of the Draft EIR concluded that Alternative 2 would be the Environmentally Superior Alternative since it would incrementally reduce several of the Project's environmental impacts and would meet most of the objectives of the Project, particularly with respect to City policies regarding concentration of development within Regional Centers and TPAs for the purpose of reducing VMT. Because Modified Alternative 2 would further reduce several of Alternative 2's impacts and be substantially consistent with the objectives of the Project in a similar manner as Alternative 2, Modified Alternative 2 is the Environmentally Superior Alternative.

4. Effects of Revisions, Clarifications and Corrections

As discussed in Chapter 1 of this Final EIR, CEQA gives lead agencies the authority to adopt a project alternative rather than the proposed project, particularly where the agency finds the alternative to be more environmentally beneficial than the originally proposed project. See CEQA Guidelines Section 15002(a)(3); *Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 533 (CEQA gives lead agencies “the flexibility to implement that portion of a project that satisfies their environmental concerns.”) CEQA anticipates circumstances where new information can be included in a Final EIR without recirculation of the Draft EIR. In order to give a degree of finality to EIR documentation, CEQA only requires recirculation of a Draft EIR when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred, but before the EIR is certified.³² Section 15088.5(a) of the State CEQA Guidelines states: “New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.
3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”

State CEQA Guidelines Section 15088.5(b) also provides that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

The inclusion of Modified Alternative 2 for consideration does not constitute “significant new information.” The Modified Alternative 2 would not result in a new significant impact (Criterion 1) or in a substantial increase in the severity a significant impact (Criterion 2) identified in the Draft EIR.

Regarding Criterion 3, the Modified Alternative 2 would implement the same mitigation measures as the Project, all of which were analyzed in the Draft EIR, with certain minor modifications that would not result in new significant environmental impacts. The Modified Alternative 2, as

³² See California Public Resources Code Section 21092.1 and State CEQA Guidelines Section 15088.5.

described herein, would include a development program substantially similar to that described in Alternative 2 of the Draft EIR, with the noted exceptions of the elimination of Building 2 and a taller tower. This Modified Alternative 2 does not provide significant new information per Criterion 3.

Regarding Criterion 4, the Draft EIR provided a comprehensive analysis of environmental issues determined to have potentially significant impacts following completion of the Project's Initial Study and EIR scoping process. Technical analysis was provided by experts in their respective fields for those issues evaluated in the Draft EIR, where necessary. Responses have been provided in Chapter 2 of this Final EIR to all public comments on the Draft EIR, which clarify information and analysis presented in the Draft EIR, with corrections and additions provided within this Chapter 3. Responses have been prepared in accordance with CEQA Guidelines Section 15088.

All in all, (1) The Draft EIR comprehensively evaluated the Project and Alternatives 1 through 4; (2) All of the impacts conclusions for the Project and Alternatives 1 through 4, as disclosed in the Draft EIR remain valid, with the exception of the identified impact conclusions for the Project that have been reduced to less than significant based on substantial evidence in the Final EIR; and (3) consideration and the possible adoption of the Modified Alternative 2 does not render the Draft EIR invalid/inadequate. Therefore, the Draft EIR was fundamentally adequate for assessing the Project's environmental impacts and allowed for meaningful public review and comments.

Based on the above, no new significant information is introduced in the Final EIR that would warrant recirculation as set forth in CEQA Guidelines Section 15088.5.