

## **VI. Other CEQA Considerations**

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## 1. Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(b) states:

*Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, and summarized below, implementation of the Project would result in significant and unavoidable impacts related to on-site and off-site noise and vibration during construction. In addition, as evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, the following cumulative impacts would be significant and unavoidable: off-site construction noise and off-site construction vibration. All other impacts associated with the Project would be less than significant or reduced with mitigation to less than significant.

### a. On-Site Construction Noise

As discussed in Section IV.G, Noise, of this Draft EIR, the estimated construction noise levels would exceed the significance thresholds by 35.8 dBA at receptor R1 (hotel adjacent to southeastern corner the Project Site) and up to approximately 5.0 dBA at receptor R3 (hostel on the east side of Schrader Boulevard south of Hollywood Boulevard). Mitigation Measure NOI-MM-1 would be implemented to reduce on-site construction noise impacts. Implementation of Mitigation Measure NOI-MM-1 would reduce the Project's on-site construction noise impacts during construction; however, significant impacts resulting from on-site construction noise would remain at receptor location R1. As such, there are no feasible mitigation measures that could be implemented to reduce the construction noise impact at R1 to a less than significant level.

In the event Project construction occurs concurrently with construction activities for Related Project Nos. 75 and 92 within 1,000 feet of the Project Site, cumulative

construction noise impacts would potentially exceed the 5-dBA significance threshold at receptor location R2. Therefore, construction noise impacts resulting from the Project would be cumulatively considerable and would be considered significant. Construction-related noise levels from the related projects would be intermittent and temporary, and it is anticipated that, as with the Project, the related projects would comply with the construction hours and other relevant provisions set forth in the Los Angeles Municipal Code (LAMC). Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Nevertheless, if nearby related projects were to be constructed concurrently with the Project, significant cumulative construction noise impacts could occur. No feasible mitigation measures were identified that could reduce this impact to a less than significant level.

## **b. On-Site Construction Vibration**

As discussed in Section IV.G, Noise, of this Draft EIR, on-site construction vibration would exceed the 0.12 PPV significance criteria for building damage to historic buildings for the on-site Attie Building, the 0.2 PPV criteria for the two-story building adjacent to the Project Site to the east, and the 0.3 PPV criteria at the three-story building adjacent to the Project Site to the south. Mitigation Measure MM-NOI-2 would be implemented to reduce this impact to a less-than-significant level. However, with respect to human annoyance, the estimated vibration levels at receptor location R1 would be above the 72 VdB significance threshold for residential uses. There are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts associated with human annoyance from on-site construction to a less-than-significant level. Therefore, temporary and intermittent vibration impacts with respect to human annoyance as a result of on-site construction activities would be significant and unavoidable.

## **c. Off-Site Construction Noise**

As discussed in Section IV.G, Noise, of this Draft EIR, although Project-level noise impacts from off-site construction would be less than significant, cumulative noise due to construction truck traffic from the Project and other related projects would likely exceed the ambient noise levels along the haul route by 5 dBA. Additionally, any alternative haul route between the Project Site and US-101 would also pass similar sensitive receptors and would likely exceed the significance threshold. As such, there are no feasible mitigation measures that could be implemented to reduce cumulative off-site construction noise impacts to a less than significant level. As such, cumulative noise impacts from off-site construction would be significant and unavoidable.

## **d. Off-Site Construction Vibration**

As evaluated in Section IV.G, Noise, of this Draft EIR, temporary vibration levels could reach approximately 75 VdB periodically as trucks pass sensitive receptors along the anticipated haul route(s). There are residential and hotel uses along Hollywood Boulevard, Cahuenga Boulevard, and Highland Avenue, which would be exposed to ground-borne vibration above the 72-VdB significance threshold from the construction trucks. Therefore, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent vibration from construction trucks traveling along the anticipated haul route(s) would be significant. In addition, as related projects would be anticipated to use similar trucks as the Project, it is anticipated that construction trucks would generate similar vibration levels along the anticipated haul route. Therefore, to the extent that other related projects use the same haul route as the Project, potential cumulative human annoyance impacts associated with temporary and intermittent vibration from haul trucks traveling along the designated haul routes would be significant. Since there are no feasible mitigation measures that would reduce the potential vibration impacts with respect to human annoyance, Project-level and cumulative vibration impacts with respect to human annoyance as a result of off-site construction truck travel would be significant and unavoidable.

## **2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts**

In addition to identification of a project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines states that where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As discussed above, the Project would result in significant and unavoidable Project-level and cumulative impacts related to on-site construction noise, and on-site and off-site vibration during construction pursuant to the threshold for human annoyance. In addition, cumulative noise impacts from off-site haul trucks would be significant and unavoidable. The Project's significant noise and vibration impacts would occur during construction for limited durations from the operation of construction equipment and haul trucks. Such impacts would be short-term and would cease upon completion of certain construction activities. Nevertheless, as evaluated in Section V, Alternatives, of this Draft EIR, alternatives to the Project were considered to eliminate the Project's significant noise and vibration impacts. As discussed therein, significant construction noise and vibration impacts would be expected to occur with any development scenario because of construction activities and the need to demolish the existing buildings on the Project Site

are inherently disturbing. Thus, reducing temporary construction noise and vibration impacts to below a level of significance at adjacent uses is infeasible. Furthermore, any reduction in the intensity of construction activities on an hourly or daily basis would increase the duration of the construction period and prolong construction noise. Additionally, among the alternatives considered, no feasible alternative was identified that would eliminate the Project's significant and unavoidable noise and vibration impacts with the exception of the No Project/No Build Alternative. Although the No Project/No Build Alternative would avoid the Project's significant and unavoidable impacts, the No Project/No Build Alternative would not meet the underlying purpose of the Project or any of the Project objectives, and is not considered a feasible development alternative. As discussed in Section V, Alternatives, of this Draft EIR, the Project, as proposed, satisfies the Project objectives to a substantially greater degree than any of the proposed alternatives. This Draft EIR also includes mitigation measures that reduce the potential impacts associated with the Project to the extent feasible.

As discussed in Section II, Project Description, of this Draft EIR, the Project is a mixed-use project that would revitalize the Project Site and provide new multi-family housing and neighborhood-serving retail, restaurant, and office uses that would serve the community, promote walkability, and create jobs. In addition, the Project would provide new residential units to help support the City's housing needs, and those of the Hollywood community in particular. The Project would also be consistent with the City's Walkability Checklist and Citywide Design Guidelines, creating a street-level identity for the Project Site and improving the pedestrian experience through the introduction of active street adjacent uses such as neighborhood-serving commercial uses. The underlying purpose and objectives of the Project are closely tied to the objectives of the Hollywood Community Plan and Hollywood Community Plan Update, which support the objectives and policies of applicable larger-scale regional and local land use plans, including SCAG's 2016–2040 Regional Transportation Plan/Sustainability Communities Strategy (2016–2040 RTP/SCS) and the City's General Plan.

The 2016–2040 RTP/SCS identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. It also balances the region's future mobility and housing needs with economic, environmental, and public health goals. Within the 2016–2040 RTP/SCS, the overarching strategy includes plans for "High Quality Transit Areas," "Livable Corridors," and "Neighborhood Mobility Areas" as key features of a thoughtfully planned, maturing region in which people benefit from increased mobility, more active lifestyles, increased economic opportunity, and an overall higher quality of life. In support of the vision of SCAG's 2016–2040 RTP/SCS, the Project would focus housing and employment growth within a High Quality Transit Area, which would promote SCAG's objective to maximize mobility and accessibility for the region. The Project would also support SCAG's goal to provide sustainable communities by creating an environmentally sensitive development. Specifically, the Project would incorporate

sustainable and green building design and construction strategies, including energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction measures. In addition, the Project would incorporate the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials wherever possible. Furthermore, the Project would include the use of LED lighting; use of drought-tolerant plants and indigenous species; use of low flow faucets, high efficiency clothes washers, and toilets; installation of occupancy controlled light switches and thermostats; incorporation of energy-efficient design methods and technologies; installation of pre-treatment stormwater infrastructure; installation of catch basin inserts and screens to provide runoff contaminant removal; and implementation of a construction waste management plan to recycle and/or salvage nonhazardous construction debris or minimize the generation of construction waste, among others.

The Project would be modern in design but would take design cues from nearby historic Hollywood buildings, such as the Taft Building at Hollywood Boulevard and Vine Street, the Warner Theater/Pacific Building at Hollywood Boulevard and Wilcox Avenue, the Security Pacific Bank Building at Hollywood Boulevard and Cahuenga Boulevard, and the Equitable Building at Hollywood Boulevard and Vine Street. The proposed building's mostly white exterior combined with accents of color pulled from its neighbors presents a modern building that reflects its surroundings through the use of a solid, cementitious exterior, and its vertical façade rhythm. The stepped design would also reduce the building's perceived height and mass from the generally low-rise development along Hollywood Boulevard. In addition, by adding community-serving retail and restaurant space and the residential amenities on Wilcox Avenue, the Project would promote a pedestrian-friendly environment. Furthermore, the Project would incorporate project design features and mitigation measures that promote environmental sustainability. These include, but are not limited to, energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction features, which would reduce the potential demand on Citywide infrastructure and energy resources.

The Project Site is located in an area that is characterized by a high degree of pedestrian activity and is well-served by public transit. The Project's location allows access to public transit and encourages alternative modes of transportation. In addition, the Project would provide short- and long-term bicycle parking to promote biking as an alternative mode of transportation. Furthermore, the proposed ground-level neighborhood-serving commercial retail and restaurant uses are intended to promote pedestrian activity and further activate the streets in the surrounding area. These beneficial features would support the City's policies to reduce vehicle miles traveled (VMT) and mobile source greenhouse gas (GHG) emissions.

The Project has also been certified as an environmental leadership project under the Jobs and Economic Improvement through Environmental Leadership Act (Assembly Bill

[AB] 900). As part of the certification process, the Project committed to the United States Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold® certification, the installation of solar panels, net-zero GHG emissions, and implementation of the TDM Program to reduce peak hour vehicular traffic to and from the Project Site by 15 percent.

Overall, the Project presents several benefits that override the limited and temporary adverse effects it may have on the environment.

### **3. Significant Irreversible Environmental Changes**

Section 15126.2(c) of the CEQA Guidelines indicates that an EIR should evaluate significant irreversible environmental changes that would be caused by implementation of a proposed project. As stated in CEQA Guidelines Section 15126.2(c), “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The Project would necessarily consume a limited amount of slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation. As demonstrated below, the Project would consume a limited commitment of natural resources and would not result in significant irreversible environmental changes. Furthermore, the existing uses on the Project Site are currently consuming slowly renewable and non-renewable resources, and do not incorporate the conservation features the Project proposes.

#### **a. Building Materials and Solid Waste**

Construction of the Project would require consumption of resources that do not replenish themselves or which may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), and petrochemical construction materials (e.g., plastics).

The Project's generation of solid waste is addressed in the Initial Study for the Project, which is included as Appendix A of this Draft EIR. Pursuant to Senate Bill (SB) 1374, during construction of the Project, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. In addition, during operation, the Project would provide a designated recycling area for Project residents to facilitate recycling in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) and the Los Angeles Green Building Code. The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source sorted receptacles to facilitate recycling. Thus, the consumption of non-renewable building materials such as lumber, aggregate materials, and plastics would be reduced.

## **b. Water**

Consumption of water during construction and operation of the Project is addressed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR. As evaluated therein, given the temporary nature of construction activities, the short-term and intermittent water use during construction of the Project would be less than the net new water consumption estimated for the Project at buildout. In addition, the water demand during construction would be considerably less than the existing uses (approximately 286 gallons per day [gpd] vs 2,372 gpd) and this water demand would be offset by the reduction of water demand currently consumed by the existing uses, the majority of which would be removed as part of the Project. During operation, the estimated water demand for the Project would not exceed the available supplies projected by the Los Angeles Department of Water and Power (LADWP). Thus, LADWP would be able to meet the water demand of the Project, as well as the existing and planned future water demands of its service area. In addition, pursuant to Project Design Feature WAT-PDF-1, the Project would implement a variety of water conservation features to reduce indoor water use by at least 35 percent and outdoor water use by at least 30 percent in excess of the City of Los Angeles Green Building Code. Thus, as evaluated in Section IV.I.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

## **c. Energy Consumption**

During ongoing operation of the Project, non-renewable fossil fuels would represent the primary energy source, and thus the existing finite supplies of these resources would be incrementally reduced. Fossil fuels, such as diesel, gasoline, and oil, would also be consumed in the use of construction vehicles and equipment. Project consumption of non-renewable fossil fuels for energy use during construction and operation of the Project is addressed in Section IV.C, Energy, of this Draft EIR. As discussed therein, construction



activities for the Project would not require the consumption of natural gas, but would require the use of fossil fuels and electricity. On- and off-road vehicles would consume an estimated 89,295 gallons of gasoline and approximately 116,644 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.001 percent of projected the 2021 (construction start year) annual on-road gasoline-related energy consumption and 0.009 percent of the 2021 annual diesel fuel-related energy consumption in Los Angeles County. Therefore, the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy resources as per Public Resources Code (PRC) section 21100(b)(3). Therefore, impacts related to the consumption of fossil fuels during construction of the Project would be less than significant.

During operation, the Project's increase in electricity and natural gas demand would be within the anticipated service capabilities of LADWP and the Southern California Gas Company, respectively. As discussed in Section IV.C, Energy, of this Draft EIR, the Project would comply with 2019 Title 24 standards and applicable 2019 CALGreen requirements, and as part of the Project's AB 900 commitment, seek LEED Gold® certification. Among other measures, to meet LEED Gold® requirements, the Project would exceed LEED baseline requirements by 22 percent, use Energy Star-labeled products and applicants, and use LED lighting where appropriate, to reduce electricity use. Therefore, the Project would not cause the wasteful, inefficient, and unnecessary consumption of energy. In addition, Project operations would not conflict with adopted energy conservation plans. Refer to Section IV.C, Energy, of this Draft EIR, for further analysis regarding the Project's consumption of energy resources.

#### **d. Environmental Hazards**

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, the types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for residential and commercial developments. Specifically, operation of the Project would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, state, and local regulations. Any associated risk would be reduced to a less than significant level through compliance with these standards and regulations. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

## e. Conclusion

Based on the above, Project construction and operation would require the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources and the Project Site for future generations or for other uses. However, the consumption of such resources would not be considered substantial and would be consistent with regional and local growth forecasts and development goals for the area and are in part balanced against existing uses. The loss of such resources would not be highly accelerated when compared to existing conditions and such resources would not be used in a wasteful manner. Therefore, although irreversible environmental changes would result from the Project, such changes are concluded to be less than significant, and the limited use of nonrenewable resources that would be required by Project construction and operation is justified.

## 4. Growth-Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

### a. Population

As discussed in Section II, Project Description, of this Draft EIR, the Project includes 260 multi-family residential units. According to the Department of City Planning, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.42 persons per unit.<sup>1,2</sup> Applying this factor, development of 260 multi-family

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<sup>1</sup> Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019. The Initial Study prepared for the Project and included as Appendix A of this Draft EIR used a rate of 2.86 persons per unit based on a single-year estimate from the American (Footnote continued on next page)

residential units would result in a net increase of approximately 630 residents. According to the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), the forecasted population for the City of Los Angeles Subregion in 2016 was approximately 3,954,629 persons.<sup>3</sup> In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,145,604 persons.<sup>4</sup> Thus, the 630 estimated net new residents generated by the Project would represent approximately 0.33 percent of the population growth forecasted by SCAG in the City of Los Angeles Subregion between 2016 and 2023. Therefore, the Project's residents would be well within SCAG's population projections in both the 2016 RTP/SCS for the City of Los Angeles Subregion and would not result in a significant direct growth-inducing impact.

## b. Employment

In addition to the residential population generated by the Project, the Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project.

During construction, the Project would create temporary construction-related jobs. However, the work requirements of most construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be expected to relocate to the vicinity of the Project Site as a direct consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be considered growth inducing from a short-term employment perspective. Rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

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*Community Survey. The Department of City Planning subsequently confirmed the 2.42 average was the factor to be used.*

<sup>2</sup> *The draft Hollywood Community Plan Update being prepared by the City utilizes an estimated household size of 2 persons per unit. The Hollywood Community Plan Update is a long-range planning document that accounts for a wide range of development types that may occur over a 20-year period and therefore, its projected household size of 2 persons per unit does not specify unit sizes. For individual development projects for a specific site containing two-bedroom and larger units, it is more representative to utilize the average citywide household size calculated using data from the American Community Survey 5-year average rather than the draft Hollywood Community Plan Update. This Project proposes a range of studio, one-bedroom, and two-bedroom units, therefore this Draft EIR assumes the citywide 2.42 persons per unit factor.*

<sup>3</sup> *Based on a linear interpolation of 2012–2040 data.*

<sup>4</sup> *Based on a linear interpolation of 2012–2040 data.*

With regard to employment during operation of the Project, the Project's commercial component would result in 39 permanent jobs based on employee generation rates published by the Los Angeles Unified School District (LAUSD) and based on the Applicant's other properties, the Project's residential component would result in an additional 13 jobs for a total of 52 permanent jobs.<sup>5</sup> According to the 2016–2040 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2016 was approximately 1,763,929 employees.<sup>6</sup> In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have approximately 1,882,104 employees.<sup>7</sup> Thus, the Project's 52 estimated employees would constitute approximately 0.05 percent of the employment growth forecasted between 2016 and 2023. Therefore, the Project would not cause an exceedance of SCAG's employment projections contained in the 2016 RTP/SCS. In addition, the proposed neighborhood-serving retail and restaurant uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, including some that may currently work on-site, and who generally do not relocate their households due to such employment opportunities. Therefore, given that some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated Project employees who may relocate their place of residence would not be substantial. Although it is possible that some of the employment opportunities offered by the Project would be filled by persons moving into the surrounding area, which could increase demand for housing, it is anticipated that most of this demand would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. As such, the Project's neighborhood-serving retail and restaurant uses would be unlikely to create an indirect demand for additional housing or households in the area.

### **c. Utility Infrastructure Improvements**

The area surrounding the Project Site is already developed with residential, commercial, and entertainment-related uses, and the Project would not remove impediments to growth. The Project Site is located within an urban area that is currently served by existing utilities and infrastructure. While the Project may require minor local infrastructure upgrades to maintain and improve water, electricity, and natural gas lines on-site and in the immediate vicinity of the Project Site, as well as a possible 150-foot

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<sup>5</sup> *Based on employee generation factors provided in the 2018 LAUSD Developer Fee Justification Study, March 2018.*

<sup>6</sup> *Based on a linear interpolation of 2012–2040 data.*

<sup>7</sup> *Based on a linear interpolation of 2012–2040 data.*

extension of a sewer main to accommodate Project wastewater flows,<sup>8</sup> such improvements would be limited to serving Project-related demand, and would not necessitate major local or regional utility infrastructure improvements that have not otherwise been accounted and planned for on a regional level.

#### **d. Conclusion**

Overall, the Project would be consistent with the growth forecast for the City of Los Angeles Subregion and would be consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of VMT. In addition, the Project would not require any major roadway improvements nor would the Project open any large undeveloped areas for new use. Any access improvements would be limited to driveways necessary to provide immediate access to the Project Site and to improve safety and walkability. Therefore, direct and indirect growth-inducing impacts would be less than significant.

### **5. Potential Secondary Effects of Mitigation Measures**

Section 15126.4(a)(1)(D) of the CEQA Guidelines states that “if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.” With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the Project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the proposed mitigation measures, listed by environmental issue area.

#### **a. Cultural Resources**

Mitigation Measure CUL-MM-1 states that a qualified archeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. If paleontological materials are encountered, the archeologist shall temporarily divert or

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<sup>8</sup> As discussed in Section IV.1.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the sewer lines adjacent to the Project Site do not currently have capacity to serve the Project. LASAN currently has plans to address this capacity issue through maintenance or pipe size upgrades in these lines. In the event additional capacity adjacent to the Project Site is not created, LASAN is also reviewing the feasibility of creating a 150-foot extension of sewer main from an existing 8-inch line west of the Project Site.

redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The archaeologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. This mitigation measure represents procedural actions and would be beneficial in protecting archaeological resources that could potentially be encountered on-site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

## **b. Geology and Soils—Paleontological Resources**

Mitigation Measure GEO-MM-1 states that a qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. This mitigation measure represents procedural actions and would be beneficial in protecting paleontological resources that could potentially be encountered on-site. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

## **c. Noise**

Mitigation Measure NOI-MM-1 requires the use of temporary and impermeable sound barrier along the Project's southern and western property lines between the Project construction area and affected receptors to reduce construction-related noise levels. The temporary sound barrier shall be designed to provide 15-dBA noise reduction at ground level of the adjacent noise-sensitive receptor R1 and 6-dBA noise reduction at ground level of the adjacent noise sensitive receptor R3. The noise and vibration from installation of the temporary sound barrier would be short-term and would be required to comply with the City's noise thresholds. In addition, upon completion of construction, the temporary sound barrier would be removed. As such, implementation of this mitigation measure would not result in adverse long term secondary impacts.

Mitigation Measure NOI-MM-2 requires the Applicant to retain the services of a structural engineer to develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the Attie Building, the two-story commercial building on Hollywood Boulevard (adjacent to the Project Site to the east), and the three-story hotel building on Wilcox Avenue. In the event damage occurs to historic finish materials (applicable to the Attie Building, which is part of the Project) due to construction vibration, such materials shall be repaired in a manner that meets the Secretary of the Interior's Standards. This mitigation measure would be beneficial in addressing the Project's potential construction vibration impacts on the Attie Building, the two-story commercial building on Hollywood Boulevard, and the three-story hotel building

on Wilcox Avenue. In addition, this mitigation measure would not result in physical changes to the environment. As such, implementation of this mitigation measure would not result in adverse secondary impacts.

## 6. Effects Not Found To Be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. An Initial Study was prepared for the Project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City of Los Angeles determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics; air quality—odors; agricultural and forestry resources; biological resources, including potential conflicts with habitat conservation plans and natural community conservation plans; geology and soils; hazards and hazardous materials; hydrology and water quality; land use—division of an established community; mineral resources; noise—airport noise and private airstrip noise; population and housing; transportation—air traffic and hazardous design features; stormwater drainage facilities; and solid waste.<sup>9</sup> A summary of the analysis provided in Appendix A for these issue areas is provided below.

### a. Aesthetics

The Project is a mixed-use residential development which is entirely within 0.5 mile of a major transit stop (i.e., the Hollywood/Vine Metro Station 0.25 miles east of the Project Site), and meets PRC Section 21099's definition of an infill site as a lot located within an urban area that has been previously developed. Therefore, pursuant to SB 743 and City Zoning Information (ZI) File 2452, the Project's aesthetic impacts shall not be considered a significant impact on the environment as a matter of law.<sup>10</sup> Notwithstanding the mandate imposed by SB 743, the Initial Study included a discussion of aesthetics for informational purposes only.

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<sup>9</sup> *At the time the Initial Study was published, the Appendix G thresholds did not address telecommunications facilities and wildfire. The City has since adopted the revised Appendix G thresholds and these topics are evaluated below.*

<sup>10</sup> *ZI 2452, states that "A project shall be considered to be within a TPA if all parcels within the project have no more than 25 percent of their area farther than 0.5 mile from the major transit stop and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than 0.5 mile from the major transit stop."*

As discussed therein, scenic vistas of the Project Site and surrounding vicinity are generally limited due to surrounding development, but the Project would not substantially block these views. The Project is not located along a state scenic highway and contains no protected trees or rock outcroppings. The historic Attie Building on the Project Site would be rehabilitated and restored as part of the Project. With respect to visual character and quality, the Project would become part of the urban fabric and the Project massing, height, and aesthetic character would be consistent with many of the existing and proposed commercial and residential structures in the vicinity of the Project Site and there are no shade sensitive uses surrounding the Project Site. Lighting and glare associated with Project operation would not result in a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

## **b. Agricultural and Forest Resources**

The Project Site is located in an urbanized area of the City of Los Angeles and is developed with commercial uses and surface parking areas. The Project Site and surrounding area are not zoned for agricultural or forest uses, and no agricultural or forest lands occur on-site or in the Project area. Therefore, the Initial Study concluded that no impacts would occur.

## **c. Air Quality—Odors**

No objectionable odors are anticipated as a result of either construction or operation of the Project. Construction of the Project would use conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. The Project would not include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, fiberglass molding, or other land uses associated with odor complaints. On-site trash receptacles which have the potential to create odors, would be contained, located, and maintained in a manner that promotes odor control such that no substantially adverse odor impacts would be anticipated. Thus, the Initial Study concluded that odor impacts would be less than significant.

## **d. Biological Resources**

The Project Site is located in an urbanized area and is developed with low-rise commercial uses and surface parking areas. Limited ornamental landscaping exists on-site. Due to the developed nature of the Project area, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Thus, the Project would not have a substantial adverse effect, either directly or through habitat



modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). There are no riparian or other sensitive natural communities, or federally protected wetlands as defined by Section 404 of the Clean Water Act on the Project Site or in the surrounding area. In addition, there are no established native resident or migratory wildlife corridors on the Project Site or in the vicinity. Accordingly, development of the Project would not significantly impact any regional wildlife corridors or native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity. There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved habitat conservation plans applicable to the Project Site.

There are no protected trees on the Project Site. However, two ornamental trees would be removed during construction. Although unlikely, these trees could potentially provide nesting sites for migratory birds. Removal of these trees would comply with the Migratory Bird Treaty Act (MBTA), which regulates vegetation removal during the nesting season to ensure that significant impacts to migratory birds would not occur. Compliance with the MBTA would ensure that impacts would be less than significant. In addition, new trees would be planted within the Project Site in accordance with LAMC requirements.

The planting of new tree species would be selected to enhance the pedestrian environment, convey a distinctive high quality visual streetscape, and complement trees in the surrounding area. Therefore, the Initial Study concluded that impacts to biological resources would be less than significant.

## **e. Geology and Soils**

The Project is not located within an Alquist-Priolo Earthquake Fault Zone, but is within 700 feet of the projected surface trace of the Hollywood Fault. The Fault Rupture Report included as Appendix IS-3 of the Initial Study identified no vertical anomalies or steps that could be attributed to faulting and determined the potential for surface fault rupture on the Project Site was very low and no restricted use zones would be required. Therefore, the Project would not expose people or structures to substantial adverse effects associated with fault rupture, and would not cause or exacerbate seismic conditions on the Project Site, and impacts would be less than significant.

The Project would increase the amount of development on-site, thereby increasing the number of residents, employees, and visitors on-site. However, as with any new development, building design and construction for the Project would be required to conform to the current seismic design provisions of the California Building Code and Los Angeles Building Code, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. Furthermore, the

Project would not exacerbate existing environmental conditions with regard to seismic ground shaking. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Thus, with compliance with regulatory requirements, impacts associated with seismic ground shaking would be less than significant.

The City's General Plan maps identify the Project Site as being prone to liquefaction. However, as discussed in the Geotechnical Report included as Appendix IS-2 of the Initial Study, based on the groundwater depth encountered in soil borings and the regional groundwater data provided by the County, groundwater beneath the Project Site is greater than 50 feet below the bottom of the proposed subterranean parking structure. Liquefaction of soils in excess of 50 feet below a structure typically has a minimal impact on structures at the surface. Therefore, because of a lack of near-surface groundwater beneath the Project Site, the potential for liquefaction-induced damage to the proposed structures is considered negligible. Thus, the Project would not expose people or structures to substantial adverse effects associated with liquefaction, and the Project would not exacerbate existing conditions with regard to liquefaction. As such, potential impacts associated with liquefaction would be less than significant.

The Project Site and surrounding area are fully developed and characterized by relatively flat topography with minimally sloping terrain. The Project Site is not located in a landslide area as mapped by the State nor is the Project Site mapped as a landslide area by the City of Los Angeles. Further, the development of the Project does not propose substantial alteration to the existing topography. As such, the Initial Study concluded that no impacts from landslides would occur.

Project construction activities including grading, excavation, and other construction activities that have the potential to disturb existing soils and expose soils to rainfall and wind, thereby potentially resulting in soil erosion. As discussed in the Initial Study, with compliance with regulatory requirements, soil erosion impacts would be less than significant.

As noted above, the Project Site is not prone to landslides and based on the depth to groundwater, subsidence and liquefaction are unlikely at the Project Site. However, seismically induced settlement of dry sands underlying the Project Site could occur. To address this, the Geotechnical Report, included as Appendix IS-2 of the Initial Study, recommends a relatively rigid foundation system such as a structural mat slab or stiff post-tensioned slab. Specifically, it is recommended that the structural foundation for the proposed high-rise building be designed to accommodate the anticipated total and

differential ground settlements and localized loss of ground support. To minimize the effects of differential ground movement on the proposed structure, it is recommended that the main 15-story tower be supported by a relatively rigid foundation system such as a structural mat slab or stiff post-tensioned slab. It is further recommended that the proposed one-story building on the north side of the main tower be supported by a rigid foundation system (i.e., reinforced conventional spread footings tied together with tie-beams) underlain by a compacted engineered fill pad. However, other means of addressing this hazard such as ground improvement (grouting, stone columns, etc.) or deep pile foundations are also available. These methods would require additional design, calculation, and review and approval by the Los Angeles Department of Building and Safety (LADBS) to ensure the same anticipated levels of seismically induced settlement can be accommodated. Regardless of the method ultimately used, a final design-level geotechnical report would be prepared for the Project, which would in turn be reviewed and approved by LADBS prior to the issuance of building permits, pursuant to established regulatory requirements. Based on the above, the Project would not exacerbate existing conditions with regard to seismically induced settlement of dry sands. Impacts would be less than significant.

Based upon the results of expansion index testing conducted as part of the Geotechnical Report, included as Appendix IS-2 of the Initial Study, the upper on-site soils are considered to have a very low expansion potential. Thus, the Project would not exacerbate existing environmental conditions with regard to expansive soil. Impacts associated with expansive soils would be less than significant.

The existing uses on the Project Site connect to the City's sanitary sewer system and do not use septic tanks or alternative wastewater disposal systems and the Project's wastewater demand would be accommodated via connections to the existing wastewater infrastructure. As such, the Initial Study concluded that the Project would not require the use of septic tanks or alternative wastewater disposal systems and would not result in impacts related to the ability of soils to support septic tanks or alternative wastewater disposal systems.

## **f. Hazards and Hazardous Materials**

The types and amounts of hazardous materials that would be used in connection with the Project would be typical of those used for residential, retail, restaurant, and office uses. Specifically, operation of the retail, restaurant, and office uses would be expected to involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and petroleum products. The proposed residential uses would involve the limited use of household cleaning solvents and pesticides for landscaping. Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be

used and stored in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations.

Based on the Project Site's history, which is discussed in detail in the Phase I ESA included as Appendix IS-4 of the Initial Study, with compliance with regulatory requirements, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

Selma Avenue Elementary School is located approximately 1,000 feet southwest of the Project Site at 6611 Selma Avenue. Construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. Additionally, Project operation would involve the limited use of hazardous materials typically used in the maintenance of office and retail uses (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products). However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and in compliance with applicable federal, State, and local regulations. As such, the use of such materials would not create a significant hazard to nearby schools. Therefore, with proper handling and storage, the impact with regard to the release of hazardous materials within 0.25 mile of a school would be less than significant.

The Project Site is not listed in any of the databases searched as part of the Phase I ESA. Various sites in the vicinity are listed in the databases as leaking underground storage tank (LUST) sites, Resource Conservation and Recovery Act (RCRA) enforcement actions and listed hazardous waste generators, and spill reports, however, the majority of these cases are in remediation or have been closed and none of them are considered to be an issue for the Project Site. Therefore, the Project would not create a significant hazard to the public or the environment associated with identification of the Project Site on a hazardous materials list.

The Project Site is not located within 2 miles of an airport or a private airstrip or located within an airport planning area and would not result in a safety hazard for people residing or working in the area.

According to the Safety Element of the City of Los Angeles General Plan, the Project Site is not located along a designated disaster route. The nearest disaster routes are the Hollywood Freeway, located approximately 0.4 miles northeast of the Project Site, and

Santa Monica Boulevard, located approximately 1.2 miles south of the Project Site. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, both directions of travel would be maintained in accordance with the Construction Traffic Management Plan prepared pursuant to Project Design Feature TR-PDF-1 to ensure adequate circulation and emergency access. Additionally, the Project would not cause an impediment along the City's designated disaster routes or impair the implementation of the City's emergency response plan. As such, the Initial Study concluded that impacts related to implementation of an adopted emergency response plan would be less than significant.

There are no wildlands located in the vicinity of the Project Site. In addition, the City's Zoning Information and Map Access System (ZIMAS) indicates that the Project Site is not located in a Very High Fire Hazard Severity Zone. The Project Site is, however, located near a City-designated Fire Buffer Zone, which begins north of Hollywood Boulevard across from the Project Site.<sup>11</sup> As with all projects, the Project would be developed and rehabilitated in accordance with LAMC requirements pertaining to fire safety. Additionally, the proposed residential, retail, and office uses would not create a fire hazard that has the potential to exacerbate the current environmental condition relative to wildfires. Therefore, the Project would not subject people or structures to a significant risk of loss, injury, or death as a result of exposure to wildland fires. As such, the Initial Study concluded that no impacts related to wildland fires would occur.

## **g. Hydrology and Water Quality**

During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Therefore, Project-related construction activities could potentially result in adverse effects on water quality. However, as Project construction would disturb more than one acre of soil, the Project would be required to obtain coverage under the NPDES Construction General Permit (Order No. 2009-0009-DWQ, as well as its subsequent amendments 2010-0014-DWQ and 2012-0006-DWQ) pursuant to NPDES requirements. In accordance with the requirements of the permit, a Stormwater Pollution Prevention Plan (SWPPP) would be developed and

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<sup>11</sup> *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit D, November 26, 1996, p. 53.*

implemented during construction of the Project. The SWPPP would set forth BMPs, including erosion control, sediment control, non-stormwater management, and materials management measures, to minimize the discharge of pollutants in stormwater runoff. The Stormwater Pollution Prevention Plan would be carried out in compliance with State Water Resources Control Board (SWRCB) requirements and would also be subject to review by the City for compliance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC) to reduce the effects of sedimentation and erosion. Prior to the issuance of a grading permit, the Project Applicant would be required to provide the City with evidence that a Notice of Intent has been filed with the SWRCB to comply with the Construction General Permit. With compliance with these existing regulatory requirements, impacts to water quality during construction would be less than significant.

Operation of the Project would introduce sources of potential stormwater pollution that are typical of residential and retail uses (e.g., cleaning solvents, pesticides for landscaping, and petroleum products associated with circulation areas). Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. However, in accordance with NPDES requirements, the Project would be required to implement Standard Urban Stormwater Mitigation Plan (SUSMP) requirements during the operational life of the Project to reduce the discharge of polluted runoff from the Project Site. The Project would also be required to comply with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), which promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater. Based on subsurface conditions, infiltration has been deemed infeasible for the Project Site and the LID concept for the Project is stormwater capture and reuse. Runoff stored in a cistern will be pumped up for irrigation of the new landscaping around the Project Site and high flow outlets for the rainwater harvesting cistern will be routed to discharge. The SUSMP would be subject to review and approval by the City for compliance with the City of Los Angeles' Development Best Management Practices Handbook, Part B, Planning Activities. With compliance with these existing regulatory requirements, impacts on water quality during operation would be less than significant.

Historic high groundwater at the Project Site is estimated to be over 80 feet below ground surface and borings completed as part of the Project's geotechnical evaluation encountered groundwater at depths of approximately 90 feet below ground surface. The excavation depth not to exceed 40 feet for the two levels of subterranean parking is well above the groundwater level and is not expected to encounter groundwater. However, perched water zones may be encountered during excavation in areas where borings were not drilled. In the event perched groundwater was encountered, such water that would be need to be removed as part of excavation and construction would be directed to a temporary dewatering system and discharged in accordance with all applicable rules and

regulations under the NPDES Construction General Permit regulations and the City's grading permit conditions, but is not anticipated to be in a significant amount such that Project Site hydrology would be affected. Thus, potential construction-related groundwater hydrology impacts would be less than significant. Similarly, the Project would not require a permanent withdrawal of groundwater during operation of the Project. Therefore, the Project would not substantially deplete groundwater supplies.

With regard to groundwater recharge, the percolation of precipitation that falls on pervious surfaces is variable, depending on the soil type, condition of the soil, vegetative cover, and other factors. The Project Site is considered to be 100 percent impervious under existing conditions. Therefore, the degree to which surface water infiltration and groundwater recharge occurs on-site is negligible. With implementation of the Project, the amount of impervious surfaces would represent approximately 90 percent of the Project Site. As such, operation of the Project would decrease the amount of impervious surfaces on the Project Site, and no interference with groundwater recharge would occur, rather it would be improved to some extent. Furthermore, in accordance with the City's LID Ordinance, the Project would include BMPs to collect and reuse stormwater. Therefore, the Project would not substantially interfere with groundwater recharge.

With implementation of the Project, drainage from the Project Site would be conveyed similar to, or better than, the existing condition. As part of the LID requirements for the Project, the Project would include the installation of catch basins, plant drains, and roof downspouts to collect roof and site runoff and direct stormwater away from the structures through a series of underground storm drain pipes. The Project Site would continue to drain to Wilcox Avenue and all stormwater currently draining to neighboring lots would be diverted to flow out to the street to avoid cross-lot drainage. Runoff rates during a 25-year storm event would be 3.36 cubic feet per second (cfs) compared to 3.50 cfs under existing conditions and runoff rates during a 50-year storm event would be 4.14 cfs compared to 4.24 cfs under existing conditions. In addition, as the amount of impervious surfaces on the Project Site would be reduced to 90 percent through the addition of landscaping, the Project would not increase the percentage of impervious surface area on the Project Site. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project and, as such, the Project would not affect the capacity of the existing stormwater infrastructure during a 50-year storm event, as required by the City.

The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency or by the City of Los Angeles. Thus, the Project would not place housing within a 100-year flood plain or place structures that would impede or redirect flood flows within a 100-year flood plain. However, the Project Site is located within the potential inundation area for the Hollywood Reservoir, which is held by the Mulholland Dam. The Mulholland Dam is an LADWP dam located in the Hollywood Hills, approximately 1.15 mile north of the Project Site. The Mulholland Dam is regularly

inspected by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) and meets current safety regulations. In addition, LADWP has emergency response plans to address any potential impacts to its dams. Given the distance of the Mulholland Dam to the Project Site, the oversight by the Division of Safety of Dams, including regular inspections, and LADWP's emergency response program, the potential for substantial adverse impacts related to inundation at the Project Site as a result of dam failure would be less than significant.

The Project Site is approximately 11.8 miles northeast of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Site as being located within an area potentially affected by a tsunami. The Project Site is also not positioned downslope from an area of potential mudflow. Therefore, no seiche, tsunami, or mudflow events would be expected to impact the Project Site. No impacts would occur.

## **h. Land Use and Planning**

The Project Site is located in a highly urbanized area. Surrounding uses include a one-story retail building immediately to the east on Hollywood Boulevard, a three-story hotel to the south, the five-story Hollywood Pacific Theatre building to the north across Hollywood Boulevard, and one-story commercial buildings and surface parking to the west across Wilcox Avenue. The newly constructed ten-story Dream Hotel is also located southeast of the Project Site within the same block. The Project would develop 260 multi-family residential units and approximately 17,800 square feet of retail, restaurant, and office uses on the Project Site. The proposed uses are consistent with types of land uses already present or underway in the surrounding area. In addition, all proposed development would occur within the boundaries of the Project Site as it currently exists. Therefore, the Project would not physically divide, disrupt, or isolate an established community. Rather, implementation of the Project would result in further infill of an already developed community with similar land uses. Impacts would be less than significant.

## **i. Mineral Resources**

No mineral extraction operations currently occur on the Project Site. The Project Site is located within an urbanized area and has been previously disturbed by development. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geologic Survey. Therefore, the Initial Study concluded that no impacts related to mineral resources would occur.



## j. Noise—Airports

The Project Site is not located within 2 miles of an airport or within an area subject to an airport land use plan. The Project Site is also not located within the vicinity of a private airstrip. Therefore, the Project would not expose people working in the project area to excessive noise levels from airports and no impacts would occur.

## k. Population and Housing

Development of up to 260 units would result in a net increase of approximately 630 residents.<sup>12</sup> The 630 new residents generated by the Project would represent approximately 0.33 percent of the population growth forecasted in SCAG's 2016–2040 RTP/SCS for the City of Los Angeles Subregion between 2016 and 2023. The Project's 260 new residential units would constitute up to approximately 0.29 percent of the housing growth forecasted in SCAG's 2016–2040 RTP/SCS between 2016 and 2023 for the City of Los Angeles Subregion. Therefore, the Project's residents and households would be well within SCAG's population and housing projections for the Subregion.

Upon buildout, the Project's commercial component would result in 39 permanent jobs based on employee generation rates published by LAUSD and based on the Applicant's other properties, the Project's residential component would result in an additional 13 jobs for a total of 52 permanent jobs. Furthermore, the Project's 52 estimated employees would constitute approximately 0.05 percent of the employment growth forecasted in SCAG's 2016–2040 RTP/SCS between 2016 and 2023 for the City of Los Angeles Subregion. Therefore, the Project's estimated employees would be well within SCAG's employment projections for the City of Los Angeles Subregion.

As no housing currently exists on the Project Site, the development of the Project would not displace any existing housing or cause the displacement of any persons or require the construction of housing elsewhere.

Therefore, based on the above, impacts related to population and housing would be less than significant.

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<sup>12</sup> *Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019. The Initial Study prepared for the Project and included as Appendix A of this Draft EIR used a rate of 2.86 persons per unit based on a single year estimate from the American Community Survey. The Department of City Planning subsequently confirmed the 2.42 average was the factor to be used.*

Furthermore, as discussed previously, while construction of the Project would create temporary construction-related jobs, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, project-related construction workers would not be expected to relocate their household's place of residence as a consequence of working on the Project and, therefore, the Project would not be considered growth-inducing from a short-term employment perspective.

In addition, as discussed previously, it is anticipated that some of the demand for the Project's 52 estimated employees during Project operations would be filled by then-existing vacancies in the housing market and others by any new residential developments that may occur in the vicinity of the Project Site. Therefore, as some of the employment opportunities generated by the Project would be filled by people already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial.

## **I. Transportation—Airports and Hazards**

The Project Site is not located within the vicinity of any private or public airport or planning boundary of any airport land use plan. In addition, the Project's maximum height of 160 feet would not create increased levels of risk with respect to air traffic. Therefore, no impacts would occur.

The roadways adjacent to the Project Site are part of the urban roadway network and contain no sharp curves or dangerous intersections. The Project does not include any proposed modifications to the street system or any dangerous design features. In addition, the Project would not result in incompatible uses as the proposed uses are consistent with the residential, commercial, and entertainment uses in the Project vicinity. Therefore, no impacts would occur.

## **m. Utilities and Service Systems**

### **(1) Stormwater**

The Project would decrease the amount of impervious surfaces on the Project Site and reduce flow rates during all analyzed storm events. Therefore, stormwater flows from the Project Site would not increase with implementation of the Project. In addition, the Project would provide appropriate on-site drainage improvements to control runoff, including the installation of catch basins, plant drains, and roof downspouts to collect roof and site runoff and direct stormwater away from the structures through a series of underground storm drain pipes. Post-development stormwater runoff rates would decrease

compared to existing conditions during 25- and 50-year storm events. Therefore, the Project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts would be less than significant.

## (2) Telecommunications Facilities

The Project would require construction of new on-site telecommunications infrastructure to serve new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. However, the Project would prepare a Construction Traffic Management Plan pursuant to Project Design Feature TR-PDF-1, which would ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would primarily take place on-site, with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers.

## (3) Solid Waste

The Project Site is currently improved with 29,200 square feet of commercial uses, including the 9,000 square foot Attie Building that would be rehabilitated and restored as part of the Project. The commercial uses other than the Attie Building and their associated parking would be removed to construct the Project. Pursuant to SB 1374, the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. Given the remaining permitted capacity of the Azusa Land Reclamation facility, which is approximately 57.72 million tons,<sup>13</sup> as well as the remaining 163.39 million tons of capacity at the Class III

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<sup>13</sup> *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.*

landfills serving the County,<sup>14</sup> the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

The Project would generate a net increase of approximately 2,853 pounds per day of solid waste upon completion. The waste generation factors utilized do not account for recycling or other waste diversion measures, and as such, the estimated solid waste generated by the Project is likely conservative. In addition, this estimate is conservative as it does not account for the net effect of existing solid waste generated by existing uses. The estimated annual solid waste generated by the Project would represent approximately 0.03 percent of the 4,151,768 tons of solid waste disposed of by the City of Los Angeles in 2018 (the most recent year for which data is available) and represents approximately 0.001 percent of the remaining disposal capacity at the Class III landfills serving the County. As discussed below, in accordance with the City's Space Allocation Ordinance (Ordinance No. 171,687), the Project would also provide a designated recycling area for Project residents to facilitate recycling, which would further reduce the Project's waste stream.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City's Allocation Ordinance (Ordinance No. 171,687), which requires that development projects include a recycling area or room of specified size on the Project Site. Trash/recycling rooms would be provided on the ground floor and parking level P1. The Project would also comply with AB 939, AB 341, AB 1826, and City waste diversion goals, as applicable, by providing clearly marked, source sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant.

## n. Wildfire

As discussed above in Section 6.f, there are no wildlands located in the vicinity of the Project Site. In addition, ZIMAS indicates that the Project Site is not located in a Very High Fire Hazard Severity Zone. The Project Site is, however, located near a City-designated Fire Buffer Zone, which begins north of Hollywood Boulevard across from the Project Site.<sup>15</sup> As with all projects, the Project would be developed and rehabilitated in accordance with LAMC requirements pertaining to fire safety. Additionally, the proposed residential, retail, and office uses would not create a fire hazard that has the potential to

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<sup>14</sup> *County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.*

<sup>15</sup> *City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit D, November 26, 1996, p. 53.*

cause or exacerbate wildfires. Therefore, the Project would not result in impacts related to wildfires.