

I. Executive Summary

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a summary of the Hollywood and Wilcox Project (Project) and its potential environmental effects, along with a listing of the proposed Project design features and mitigation measures. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included herein are an overview of the purpose, focus, and organization of this Draft EIR; a brief discussion of areas of controversy; a description of the public review process to date for the Project; and a summary of the alternatives to the Project evaluated in this Draft EIR.

1. Purpose of this Draft EIR

As described in CEQA Guidelines Sections 15123(a) and 15362, an EIR is an informational document intended to inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to evaluate the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by CEQA Guidelines Section 15161. Furthermore, this Draft EIR complies with CEQA Guidelines Section 15064, which addresses the significance determinations of the environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not to Be Significant

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning

and Research, responsible agencies, and other interested parties on May, 26, 2017, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are 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 determined through the Initial Study the potential for significant impacts in the following environmental issue areas:¹

- Air Quality
- Cultural Resources
- Energy²
- Geology and Soils—Paleontological Resources³
- Greenhouse Gas (GHG) Emissions
- Land Use
- Noise
- Public Services (including fire protection, police protection, schools, libraries, and parks and recreation)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (water supply, wastewater, and energy infrastructure)⁴

¹ At the time the NOP was issued, the Appendix G checklist did not include a category about Wildfire. Refer to Section 4, Thresholds of Significance, below for further details on the December 2018 updates to Appendix G. Wildfire impacts are addressed in Section VI, Other CEQA, of this Draft EIR.

² At the time the NOP was issued, the Appendix G checklist did not include a question about Energy Infrastructure. The Initial Study prepared for the Project did, however, note that energy would be evaluated in the Draft EIR in accordance with Appendix F of the CEQA Guidelines. Refer to Section 4, Thresholds of Significance, below for further details on the December 2018 updates to Appendix G.

³ At the time the NOP was issued, paleontological resources were evaluated under Cultural Resources. The Appendix G checklist now evaluates paleontological resources as part of Geology and Soils. Refer to Section 4, Thresholds of Significance, below for further details on the December 2018 updates to Appendix G.

⁴ At the time the NOP was issued, the Appendix G checklist did not include a question about Energy Infrastructure. Refer to Section 4, Thresholds of Significance, below for further details on the December 2018 updates to Appendix G.

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to agricultural and forest resources; objectionable odors; biological resources; hazards and hazardous materials; hydrology and water quality; physical division of an established community; mineral resources; airport or airstrip-related noise; population and housing; changes in air traffic patterns; hazardous design features; and compliance with federal, state, and local statutes related to solid waste. Therefore, these areas are not analyzed in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR.

In addition, although no impacts were found pursuant to Public Resources Code (PRC) Section 21099(d), the Initial Study analyzes aesthetics (visual character, views, light/glare, and shading) for informational purposes only.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

- I. **Executive Summary.** This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.
- II. **Project Description.** This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.
- III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built within the Project vicinity.
- IV. **Environmental Impact Analysis.** This section contains the environmental setting, Project and cumulative impact analyses, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; cultural resources; energy; greenhouse gas emissions; land use; noise; public services (police protection, fire protection, schools, libraries, and parks and recreation); transportation; tribal cultural resources; and utilities and service systems (water supply, wastewater, and energy infrastructure).
- V. **Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; Zoning Compliant Mixed-Use Alternative; Zoning Compliant Office Alternative; Zoning

Compliant Hotel Alternative; and Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative.

- VI. Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the Project's mitigation measures. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.
- VII. References.** This section lists the references and sources used in the preparation of this Draft EIR.
- VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.
- IX. List of Preparers.** This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes following appendices that were used to prepare the environmental analysis for the Project:

- Appendix A—Initial Study, NOP (Notice of Preparation), and NOP Comment Letters
 - Appendix A.1—Initial Study
 - Appendix A.2—Notice of Preparation
 - Appendix A.3—NOP Comment Letters
- Appendix B—AB 900 Certification and Concurrence Letter
 - Appendix B.1 – AB 900 Governor's Certification Letter
 - Appendix B.2 – AB 900 Joint Legislative Budget Committee Concurrence Letter
 - Appendix B.3 – AB 900 Project Application

- Appendix B.4 – AB 900 Water Use Analysis
- Appendix B.5 – AB 900 Supplemental Recycling Requirements
- Appendix B.6 – AB 900 Supplemental Prevailing and Living Wage Requirements
- Appendix C—Technical Appendix for Air Quality and Greenhouse Gas Emissions
- Appendix D—Cultural Resources
 - Appendix D.1—Cultural Resources Report
 - Appendix D.2—Archaeological Resources Records Search
- Appendix E—Energy Calculations
- Appendix F—Utility Report
- Appendix G—Paleontological Records Search
- Appendix H—Land Use Consistency Tables
- Appendix I—Noise Calculation Worksheets
- Appendix J—LAFD Response Letter
- Appendix K—LAPD Response Letter
- Appendix L—LAUSD Response Letter
- Appendix M—LAPL Response Letter
- Appendix N—RAP Response Letter
- Appendix O—Transportation
 - Appendix O.1—Traffic Study
 - Appendix O.2—VMT Memo
 - Appendix O.3—LADOT Assessment Letter (Traffic Study)
 - Appendix O.4—LADOT Assessment Letter (VMT Memo)
- Appendix P—Tribal Cultural Resources Report
- Appendix Q—Alternatives Traffic Analysis

4. Thresholds of Significance

In 2006, the City published the *L.A. CEQA Thresholds Guide* (Thresholds Guide) as a guidance document for preparing CEQA analyses for projects within the City. The Thresholds Guide includes two sets of criteria to evaluate project impacts: screening criteria, which provide direction in determining the appropriate environmental document required for a project; and significance thresholds, which assist in determining whether a project's impacts generally would be significant under normal circumstances and would therefore require mitigation. Although intended as a voluntary tool, the Thresholds Guide offers a consistent set of evaluation criteria applicable to most discretionary projects in the City, and the Los Angeles Department of City Planning (DCP) has typically used both the screening criteria and significance thresholds as the basis for project analyses in its CEQA documents. However, the Thresholds Guide clearly indicates the Lead Agency—in this case, the DCP—retains the authority to determine significance thresholds on a case-by-case basis, dependent upon unique environments, evolving regulatory requirements, and the nature of each project. In addition, the Thresholds Guide states it is not intended as a substitute for the use of independent judgment to determine significance or the evaluation of the evidence in the record. Moreover, it states “because evaluation practices continue to evolve due to changing regulations, scientific methods, and court decisions, the project evaluator and lead City agency should always use the best information and evaluation methods available, including those from sources other than the Thresholds Guide.”⁵

In light of an evolving regulatory environment, recent case law, new topics such as greenhouse gas emissions and tribal cultural resources that are now addressed in Appendix G of the State CEQA Guidelines (Appendix G), and the age of the Thresholds Guide, the DCP has begun to update its CEQA guidance. At this point in time, the DCP has chosen to rely on the Appendix G questions as thresholds of significance. As noted above, the City has discretion in choosing appropriate significance thresholds. Therefore, throughout this Draft EIR, the thresholds contained in Appendix G are used. The factors and considerations set forth in the Thresholds Guide are utilized where appropriate to assist in answering the Appendix G threshold questions.

In January 2018, OPR proposed comprehensive updates to the CEQA Guidelines which revised thresholds for aesthetics, air quality, cultural resources, geology and soils, hydrology and water quality, land use and planning, noise, population and housing, transportation, and utilities and service systems. The update also added energy and wildfire questions to Appendix G. The updated CEQA Guidelines became effective on December 28, 2018 and are reflected throughout this Draft EIR.

⁵ *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, p. 3.*

5. Existing Project Site Conditions

The Project Site is located in the Hollywood community of the City, approximately 6 miles northwest of downtown Los Angeles and approximately 11.8 miles northeast of the Pacific Ocean. Primary regional access is provided by the Hollywood Freeway (US-101) located approximately 0.4 mile east of the Project Site. Major arterials providing regional access to the Project Site vicinity include Hollywood Boulevard, Cahuenga Boulevard, Vine Street, and Sunset Boulevard. The Project Site is well-served by public transportation, with the Hollywood/Vine station of the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line located approximately 0.25 mile east of the Project Site, and several bus lines with stops along Hollywood Boulevard near the Project Site.

The Project Site is currently occupied by four low-rise commercial buildings that comprise a total of 29,200 square feet of floor area as well as surface parking. Included in this floor area is the 9,000-square-foot Attie Building located at the corner of Hollywood Boulevard and Wilcox Avenue. The Attie Building is a contributing structure to the Hollywood Boulevard Commercial and Entertainment District. Vehicular access to the surface parking is provided via a driveway on Wilcox Avenue.

Landscaping within the Project Site is limited. Two ornamental trees are located along Hollywood Boulevard and two ornamental trees are located within the surface parking lot. These existing trees consist of various non-native species that are not subject to the City of Los Angeles Protected Tree Relocation and Replacement Ordinance (Ordinance No. 177,404).⁶

The Project Site is located in a transit priority area as defined by Senate Bill (SB) 743 and City of Los Angeles Zoning Information (ZI) File No. 2452, and there are multiple public transportation opportunities in the immediate vicinity of the Project Site. In particular, the Metro Hollywood/Vine station Red Line located approximately 0.25 mile east of the Project Site, and several bus lines with stops along Hollywood Boulevard near the Project Site.

The Project Site has two zoning designations. The two lots that front on Hollywood Boulevard (the Hollywood Parcels) are zoned C4-2D-SN (Commercial, Height District 2 with Development Limitation, Hollywood Signage Supplemental Use District). The balance of the Project Site (the Wilcox Parcels) is zoned C4-2D (Commercial, Height District 2 with

⁶ *The City of Los Angeles Protected Tree Relocation and Replacement Ordinance (Ordinance No. 177,404) protects Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program.*

Development Limitation). Pursuant to the Los Angeles Municipal Code (LAMC), the C4 Zone permits a wide array of land uses including commercial, office, residential, retail, and hotel uses. The C4 Zone, in conjunction with the Project Site's Regional Center Commercial land use designation, and pursuant to LAMC Section 12.22 A.18, also permits any land use permitted in the R5 (Multiple Residential) Zone, which includes a density of one dwelling unit for every 200 square feet of lot area. The Height District 2 designation, in conjunction with the C4 Zone, does not impose a maximum building height limitation but does impose a maximum FAR of 6:1. The D Limitation (per Ordinance No. 165,660-SA220, adopted in 1990) on the Hollywood Parcels limits the total floor area contained in all buildings on said parcels to a maximum FAR of 2:1 and maximum height of 45 feet; however, a project could exceed the 2:1 FAR subject to certain conditions.⁷ The SN designation on the Hollywood Parcels indicates that these parcels are located within the Hollywood Signage Supplemental Use District (HSSUD).

The Project Site is also located within the Los Angeles State Enterprise Zone, the Los Angeles Promise Zone, the Hollywood Entertainment District Business Improvement District, and, as noted above, a Transit Priority Area pursuant to SB 743.

6. Jobs and Economic Improvement through Environmental Leadership Act

In September 2011, the Governor Edmund G. "Jerry" Brown signed Assembly Bill (AB) 900, the Jobs and Economic Improvement through Environmental Leadership Act, to provide streamlining benefits to "environmental leadership development projects (leadership projects)" under CEQA. The Governor's Office of Planning and Research (OPR) has provided guidelines for submitting applications for streamlined environmental review pursuant to AB 900, as amended by SB 734 and AB 246. As defined in Public Resources Code (PRC) Section 21180(b)(1), the Project is considered a leadership project as it meets the following conditions:

⁷ *The conditions are: a) The Community Redevelopment Agency Board finds that the project conforms to: (1) the Hollywood Redevelopment Plan, (2) a Transportation Program adopted by the Community Redevelopment Agency Board pursuant to Section 518.1 of the Redevelopment Plan, (3) the Hollywood Boulevard District urban design plan as approved by the City Planning Commission and adopted by the CRA Board pursuant to Sections 501 and 506.2.1 of the Hollywood Redevelopment Plan; and, if applicable, (4) any Designs for Development adopted pursuant to Section 503 of the Redevelopment Plan; and b) The project complies with the following two requirements: A Disposition and Development Agreement or Owner Participation Agreement has been executed by the Community Redevelopment Agency Board; and the Project is approved by the City Planning Commission, or the City Council on appeal, pursuant to the procedures set forth in Municipal Code Section 12.24 B.3.*

A residential, retail, commercial, sports, cultural, entertainment, or recreational use project that is certified as [Leadership in Energy and Environmental Design®] LEED gold or better by the United States Green Building Council and, where applicable, that achieves a 15-percent greater standard for transportation efficiency than for comparable projects. These projects must be located on an infill site. For a project that is within a metropolitan planning organization for which a sustainable communities strategy or alternative planning strategy is in effect, the infill project shall be consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented, achieve the greenhouse gas emission reduction target.

The Governor may certify a leadership project for a streamlined environmental review if all of the following conditions are met:

- (1) The project is residential, retail, commercial, sports, cultural, entertainment, or recreational in nature;*
- (2) The project, upon completion, will qualify for LEED Gold® certification or better. The application shall specify those design elements that make the project eligible for LEED Gold® certification or better, and the applicant shall submit a binding commitment to delay operating the project until it receives LEED Gold® certification or better. If, upon completion of construction, LEED Gold® certification or better is delayed as a result of the certification process rather than a project deficiency, the Project Applicant may petition the Governor to approve project operation pending completion of the certification process;*
- (3) The project will achieve at least 15 percent greater transportation efficiency, as defined in PRC section 21180(c), than comparable projects. The Project Applicant shall provide information setting forth its basis for determining and evaluating comparable projects and their transportation efficiency, and how the project will achieve at least 15 percent greater transportation efficiency. For residential projects, the applicant shall also submit information demonstrating that the number of vehicle trips by residents divided by the number of residents is 15 percent more efficient than for comparable projects. For the*

purposes of this provision, comparable means a project of the same size, capacity, and location type;

- (4) The project is located on an infill site, as defined in PRC Section 21061.3, and in an urbanized area, as defined in PRC Section 21071;*
- (5) The project would provide unbundled parking for the residential dwelling units, with the exception of the workforce residential dwelling units;*
- (6) The project would result in a minimum investment of \$100 million in California upon completion of construction;*
- (7) The project would create high-wage, highly skilled jobs that pay prevailing wages and living wages and provide construction jobs and permanent jobs for Californians, and help reduce unemployment;*
- (8) The project would not result in any net additional greenhouse gas (GHG) emissions, including GHG emissions from employee transportation, as determined by the State Air Resources Board pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code;*
- (9) The project would comply with the requirements for commercial and organic waste recycling in Chapters 12.8 (commencing with PRC Section 42649) and Chapter 12.9 (commencing with PRC Section 42649.8), as applicable;*
- (10) The project applicant has entered into a binding and enforceable agreement that all mitigation measures required pursuant to PRC Division 13 to certify the Project shall be conditions of approval of the Project, and those conditions would be fully enforceable by the lead agency. In the case of environmental mitigation measures, the Project Applicant would agree, as an on-going obligation, that those measures would be monitored and enforced by the lead agency for the life of the obligation; and*
- (11) The project applicant would agree to pay the costs of the Court of Appeal in hearing and deciding any case, including payment of the costs for the appointment of a special master if deemed appropriate by the court, in a form and manner specified by the Judicial Council; and*
- (12) The project applicant would agree to pay the costs of preparing the administrative record for the Project concurrent with review and consideration of the Project pursuant to PRC Division 13, in a form and manner specified by the lead agency for the Project.*

The Project Applicant submitted an application to the Governor for certification of the Project as a leadership project under AB 900, as amended by AB 246, and the application was subject to public review from February 2, 2019, through March 7, 2019. On March 13, 2019, the California Air Resources Board issued Executive Order G-18-122, determining that the Project would not result in any net additional GHG emissions for purposes of certification under AB 900. On October 10, 2019, the Governor certified the Project as an eligible project under AB 900, and the Governor's OPR forwarded the Governor's determination to the Joint Legislative Budget Committee. According to PRC Section 21184(b)(2)(C), if "the Joint Legislative Budget Committee fails to concur or nonconcur on a determination by the Governor within 30 days of the submittal, the leadership project is deemed to be certified." The Joint Legislative Budget Committee issued a concurrence letter on November 8, 2019, and as a result, the Project was deemed certified. The Governor's certification and Joint Legislative Budget Committee's concurrence letter are provided in Appendix B of this Draft EIR.

Pursuant to PRC Section 21187, within 10 days of the Governor certifying the Project as an leadership project, the City of Los Angeles issued a public notice on October 17, 2019, stating that the Project Applicant has elected to proceed under Chapter 6.5 (commencing with Section 21178) of the PRC, which provides, among other things, that any judicial action challenging the certification of the EIR or the approval of the Project described in the EIR is subject to the procedures set forth in Sections 21185 to 21186, inclusive, of the PRC.

7. Description of the Proposed Project

a. Project Overview

The Project includes the development of a mixed-use project comprised of 260 multi-family residential units, up to 10 percent (26 units) of which would be set aside for workforce housing, and 17,800 square feet of commercial uses, comprised of 11,020 square feet of retail, 3,580 square feet of office, and 3,200 square feet of restaurant uses. The Project would rehabilitate and restore the existing two-story, 9,000-square-foot Attie Building, a contributing structure to the Hollywood Boulevard Commercial and Entertainment District, located at the corner of Hollywood Boulevard and Wilcox Avenue. The remaining uses on the Project Site would be removed to provide for development of the Project. New construction would range from one to 15 stories with a maximum height of 160 feet. Upon completion, the Project Site would include 278,892 square feet, inclusive of the 9,000-square-foot Attie Building, for a FAR of 4.5:1. A total of 420 parking spaces would be provided within five parking levels comprised of two subterranean, one at-grade level, and two above-grade levels.

b. Building Design

The Project includes the development of a mixed-use building up to 15 stories in height; rehabilitation and restoration of portions of the Attie Building; and the addition of a one-story commercial building directly east of the Attie Building. New development would be stepped back from Hollywood Boulevard and transition from 45 feet along Hollywood Boulevard to 125 feet, and then to a maximum of 160 feet within the southern portion of the Project Site. Landscaped outdoor courtyards and terraces would be integrated throughout the Project Site.

Rehabilitation and restoration of portions of the Attie Building would occur in accordance with the Secretary of Interior's Standards for Historic Rehabilitation and includes retention of the existing on-site mural. Per California Building Code Section 3404A.1, alterations to any building or structure shall comply with the requirements of the code for new construction. Therefore, the applicable provisions of Title 24 and the Los Angeles Green Building Code apply to the rehabilitation of this historic structure. Upon completion, the Attie Building would continue to be used for commercial uses.

Adjacent to the Attie Building, a new low-rise commercial building would replace an existing commercial building that is a non-contributing structure to the Hollywood Boulevard Commercial and Entertainment District. The new commercial building would be approximately 45 feet in height. This building would be contemporary in design but incorporates elements from the Attie Building, so that it would complement the contributing structure. A pool deck that would serve the residential uses in the new mixed-use building would be located on the rooftop of the new commercial building.

Community-serving retail would be located along Hollywood Boulevard, and community-serving retail and restaurant uses, together with residential amenities, including a lobby area and lounge, along Wilcox Avenue. An outdoor courtyard, which could be used as an outdoor seating/dining area for a restaurant, would also be incorporated to the north of the commercial use at ground-level along Wilcox Avenue and publicly accessible during business hours. Another outdoor courtyard would be accessible to residents only and located at ground-level at the southwestern corner of the Project Site, adjacent to the ground-floor residential amenities. Parking would be provided within five levels including two subterranean levels, one at-grade level, and two above-grade levels. The at-grade and two above-grade parking levels would be centrally located within the Project Site and would be screened from public view by the commercial uses along Hollywood Boulevard and by the commercial uses, residential amenities, and residential uses along Wilcox Avenue. The residential units would be located on Levels 3 through 15 of the new mixed-use building.

The proposed new development 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 stepped design would also reduce the building's perceived height and mass from the generally low-rise development along Hollywood Boulevard.

c. Open Space and Recreational Amenities

Landscaping would include a mix of trees, shrubs, and large planters and, where feasible, would utilize drought-tolerant plant materials native to Los Angeles. New landscaping would be provided along Wilcox Avenue and in the outdoor seating areas associated with the commercial space and the residential lounge, as well as on the sky deck, fourth floor residential courtyard, and pool deck. The landscape design would incorporate outdoor seating areas.

Per LAMC Section 12.21 G, the Project is required to provide 29,150 square feet of open space. The Project proposes 33,750 square feet of open space, including 6,745 square feet of common planted open space including a variety of common and private open space and recreational amenities, such as landscaped courtyards and terraces, a sky deck, a pool deck, gym and yoga studio, theater, library/music room, business center, trellised barbeque area, dog run deck, and private balconies. As part of the Project, two on-site trees would be removed, and two street trees along Hollywood Boulevard would be retained.

d. Signage and Lighting

Project lighting would include low-level exterior lights adjacent to buildings and along pathways for aesthetic, security and wayfinding purposes. All lighting would comply with current energy standards and codes while providing appropriate light levels for accent signage, architectural features, and landscaping elements. Project lighting would minimize light trespass from the proposed buildings and overall Project Site, and minimize sky-glow to increase night sky access. Specifically, all on-site exterior lighting would be automatically controlled via occupancy and photo sensors and/or timers to illuminate only when required. Where appropriate, interior lighting would be equipped with occupancy sensors and/or timers that would automatically extinguish lights when no one is present. All light sources would be shielded and/or directed to minimize spillover onto nearby residential areas.

Project lighting would include low-level exterior lights adjacent to buildings and along pathways for aesthetic, security, and wayfinding purposes. All lighting would comply with

current energy standards and codes while providing appropriate light levels for accent signage, architectural features, and landscaping elements. Project lighting would minimize light trespass from the proposed buildings and overall Project Site, and minimize sky-glow to increase night sky access. All exterior and interior lighting would meet high-energy-efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be subject to approval by the Bureau of Street Lighting.

All exterior and interior lighting would meet high-energy-efficiency requirements utilizing light emitting diode (LED) or efficient fluorescent lighting technology. New street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be subject to approval by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

The Project includes a signage program designed to be compatible with the proposed architecture on the Project Site and with other signage in the surrounding neighborhood. No off-premises billboard advertising is proposed as part of the Project. The three existing billboards, located on the roof of the Attie Building, would remain. Proposed new signage would include general street level tenant/site identification, visitor directional signage and temporary construction signage, as permitted per the LAMC Article 4.4, Sign Regulations. All on-site signage would be within the permitted area defined in the LAMC per each sign type and would comply with the applicable provisions of the LAMC. Additionally, signage on the parcels fronting Hollywood Boulevard would comply with the applicable provisions of the HSSUD.

e. Access, Circulation, and Parking

Vehicular access to the Project Site would be provided via a new driveway on Wilcox Avenue for commercial and residential parking. In accordance with LAMC requirements, the Project would provide a total of 420 vehicular parking spaces, including 387 spaces for the residential units and 33 spaces for the community-serving retail and restaurant uses. The vehicular parking provided accounts for a permitted 10-percent reduction, pursuant to the Los Angeles Bicycle Parking Ordinance.⁸ Parking would be provided within two levels of subterranean, one level of at-grade, and two levels of above-grade parking. As discussed above, the parking on Levels 1 and 2 would be centrally located within the Project Site and shielded from view from public streets by the

⁸ Ordinance No. 185,480 adopted in May 2018 does not apply to the Project because the Project application was deemed complete prior to its adoption. Ordinance No. 182,386 applies to the Project.

commercial uses and residential lobby and amenities. The parking on Level 3 would be screened by the residential uses lining the western portion of the parking structure. A loading area would be provided within Level 1 and shielded from the public right-of-way by the commercial uses on Wilcox Avenue.

The Project would also include short- and long-term bicycle parking, in accordance with LAMC requirements. The Project includes 269 long-term spaces and 35 short-term spaces for both residential and commercial uses. Both short-term and long-term bicycle parking would be located on Level 1.

Pedestrian access to the commercial buildings would be provided via the sidewalks along Hollywood Boulevard and Wilcox Avenue. Pedestrian access to the residential building would be provided by a residential lobby located along Wilcox Avenue. The Project would also enhance pedestrian activity along Hollywood Boulevard and Wilcox Avenue through building design and proposed streetscape amenities by providing ground-level, community-serving retail and restaurant use. Streetscape amenities provided by the Project would include a row of street trees on Wilcox Avenue, pedestrian-scale lighting fixtures and elements, and landscaped outdoor seating areas. The Project would also widen the sidewalk by five feet along a portion of Wilcox Avenue, and locate vehicular loading and drop-off within the parking structure.

f. Site Security Features

The Project would include numerous security features, including a closed circuit camera system and keycard entry for the residential building and the residential parking areas, and on-site security personnel. The Project would also be designed such that entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways would be open and in view of surrounding sites. In addition, buildings and walkways would be properly lit in order to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. Parking areas would also be sufficiently lit to maximize visibility and reduce areas of concealment.

g. Sustainability Features

The Project would incorporate features to support and promote environmental sustainability. “Green” principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and AB 900. These include, but are not limited to, measures to reduce vehicle trips, installation of solar panels, energy-efficient buildings, a pedestrian- and bicycle-friendly site design, and water conservation and waste reduction features. The Project would also utilize sustainable planning and building strategies and incorporate the use of environmentally-friendly materials, such as non-toxic paints and recycled finish materials, whenever feasible. In addition, the Project Site’s

proximity to the Metro Red Line Hollywood/Vine Station, as well as the 12 bus lines within 0.25 mile, would encourage and support the use of public transportation and a reduction in vehicle miles traveled by Project residents, employees, and visitors. The Project would also apply for LEED Gold® Certification. The following specific features would be incorporated into the Project:

Energy Conservation and Efficiency

- Use of Energy Star-labeled products and appliances, including dishwashers in the residential units.
- Use of light emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.
- Incorporation of energy-efficient design methods and technologies, such as high performance window glazing;; passive energy efficiency strategies, such as façade shading, roof overhangs, porches, and inner courtyards; high efficiency domestic heaters; and enhanced insulation to minimize solar heat gain.
- Incorporation of operable windows; shading of unit fenestration through balcony overhangs to prevent excess heat; and use of natural light.
- Use of insulated plumbing pipes and high efficiency domestic water heaters.
- Use of updated boiler controls to improve efficiency.
- Use of refrigerants that reduce ozone depletion.
- Use of energy-efficient electrical and mechanical equipment and monitoring systems.
- Installation of solar panels.

Water Conservation

- Inclusion of water conservation measures in excess of Los Angeles Department of Water and Power requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, drought-tolerant landscaping).
- Use of drought-tolerant plants and indigenous species, storm water collection through a first flush filtration system of rain gardens, where possible, and storm water filtration planters to collect roof water to be reused on-site.

- Incorporation of a leak detection system for any swimming pool, Jacuzzi, or other comparable spa equipment introduced on-site.
- Use of high-efficiency Energy Star-rated dishwashers in the residential units.
- Prohibition of the use of single-pass cooling equipment (i.e., equipment in which water is circulated once through the system, then drains for disposal with no recirculation).
- Provision for individual metering and billing for water use of all residential uses and commercial spaces.
- Installation of cooling tower automatic water treatment to minimize cooling tower blowdown and water waste.
- Use of weather-based irrigation controller with rain shutoff, matched precipitation (flow) rates for sprinkler heads, and rotating sprinkler nozzles or comparable technology such as drip/microspray/subsurface irrigation where appropriate.
- Installation of a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.
- Use of proper hydro-zoning and turf minimization, as feasible.
- Install waste piping to allow for the future installation of a greywater system to supply landscape irrigation.

Water Quality

- Use of on-site storm water treatment.
- Installation of catch basin inserts and screens to provide runoff contaminant removal.
- Preparation and implementation of a Stormwater Pollution and Prevention Plan and Standard Urban Stormwater Mitigation Plan, both of which would include Best Management Practices to control stormwater runoff, minimize pollutant loading and erosion effects during and after construction.

Solid Waste

- Provision of on-site recycling containers to promote the recycling of paper, metal, glass, organics, and other recyclable materials and adequate storage areas for such containers during construction and after the building is occupied.

- Use of building materials with a minimum of 10 percent recycled-content for the construction of the Project.
- Implementation of a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square feet of building floor area.

Transportation

- Allocation of space for installation of bike share facilities at the Project Site should a bike share program expand to the Hollywood area.
- Allocation of preferred parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.
- Provision of electric vehicle charging stations in accordance with applicable City and LAMC requirements.

Air Quality

- Employment of practices that prohibit the use of chlorofluorocarbons (CFCs) in heating, ventilation, and air conditioning (HVAC) systems.
- Meeting applicable LAMC, City, and/or State air emissions requirements for all heating or cogeneration equipment utilized at the Project Site.
- Installation of landscaping throughout the Project Site, including roof decks, pool decks, and terraces, to provide shading and capture carbon dioxide emissions.
- Use of adhesives, sealants, paints, finishes, carpet, and other materials that emit low quantities of volatile organic compounds (VOCs) and/or other air quality pollutants.

h. Project Construction and Scheduling

Construction of the Project would commence with demolition of the existing buildings, except for the Attie Building which would be retained, and surface parking areas, followed by grading and excavation for the subterranean parking. Building foundations would then be laid, followed by building construction, paving/concrete installation, and landscape installation. Project construction is estimated to take approximately 24 months with an anticipated completion date of 2023. The excavation expected for the subterranean parking would be up to 40 feet below grade. It is estimated that approximately 58,000 cubic yards of export would be hauled from the Project Site during

construction activities. During construction, temporary construction fencing would be placed along the periphery of the Project Site to screen much of the construction activity from view at the street level, and graffiti would be removed, as needed, from all temporary walkways and construction fencing throughout the Project construction period.

i. Necessary Approvals

The City of Los Angeles has the principal responsibility for approving the Project. Approvals required for development of the Project may include, but would not be limited to, the following:

- Pursuant to LAMC Section 12.32 F, a Vesting Zone/Height District Change from C4-2D-SN/C4-2D to C4-2D-SN/C4-2D to modify the D Limitation to allow a maximum FAR of 4.5:1 in lieu of the otherwise permitted 2:1 FAR per Ordinance No. 165,660-SA220;
- Pursuant to LAMC Sections 12.24 T, and 12.24 W,19, a Vesting Conditional Use Permit to allow floor area ratio averaging in a Unified Development;
- Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit to allow the sale of a full line of alcoholic beverages for on-site and off-site consumption within Project restaurants and retail stores;
- Pursuant to LAMC Section 16.05, Site Plan Review;
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map for the purpose of creating a subdivision with three ground lots and three commercial condominiums;
- A Haul Route for the export of 58,000 cubic yards of soil; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to: clearance related to the Hollywood Redevelopment Plan, temporary street closure permits, grading permits, excavation permits, foundation permits, street tree removal permits, and building permits.

j. Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain “a statement of the objectives sought by the proposed project.” Section 15124(b) of the CEQA Guidelines further states that “the statement of objectives should include the underlying purpose of the project.” The underlying purpose of the Project is to revitalize the Project Site by developing an integrated mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail, office, and restaurant

uses that serve the community and promote walkability while also rehabilitating the Attie Building. As set forth in the CEQA Guidelines, the Project's basic and fundamental objectives are provided below.

- Create a high density, mixed-use development at a location served by public transit and locate residential uses in in a transit priority area;
- Redevelop and improve the visual character of the Project Site with a high density residential, office, and commercial infill development;
- Rehabilitate the historic Attie Building and preserve its use as commercial space;
- Provide housing near public transit by constructing new residential dwelling units with varying mixes of number of-bedrooms, in an infill location close to commercial and office uses;
- Provide workforce housing to help meet the City's housing goals;
- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-adjacent uses such as neighborhood-serving commercial uses;
- Promote community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through workforce housing;
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

8. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. These areas include Project impacts related to regional on-site construction noise, on- and off-site construction vibration (related to human annoyance) as well as cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (related to human annoyance).

9. Public Review Process

As previously indicated, the City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible

agencies, and other interested parties on May, 26, 2017, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. Additionally, the Project Applicant submitted an application to the Governor for certification of the Project as a leadership project under AB 900, as amended by AB 246, and the application was subject to public review from February 2, 2019, through March 7, 2019. The Project's AB 900 application, Governor's certification, and Joint Legislative Budget Committee's concurrence letter are included in Appendix B of this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period in accordance with CEQA requirements. Following the public comment period, a Final EIR will be prepared that will include responses to any comments raised regarding this Draft EIR.

10. Summary of Environmental Impacts

Table I-1 on page 22 provides a summary of the Project's environmental impacts, which are summarized further in the sections that follow.

a. Less Than Significant Impacts

(1) Air Quality

(a) Conflicts with Applicable Air Quality Plans

(i) SCAQMD CEQA Air Quality Handbook Policy Analysis

The following analysis addresses the Project's consistency with applicable SCAQMD and SCAG policies, inclusive of regulatory compliance. In accordance with the procedures established in SCAQMD's *CEQA Air Quality Handbook*, the following criteria are required to be addressed in order to determine the Project's consistency with applicable SCAQMD and SCAG policies:

- Would the project result in any of the following:
 - An increase in the frequency or severity of existing air quality violations; or
 - Cause or contribute to new air quality violations; or
 - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Would the project exceed the assumptions utilized in preparing the AQMP?
 - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;

**Table I-1
Summary of Project Impacts**

Environmental Issue	Project Impact ^a
A. AIR QUALITY	
Conflicts with Applicable Air Quality Plans	Less Than Significant
Cumulative Emissions	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Sensitive Receptors	
<i>Construction</i>	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
<i>Operation</i>	
Regional Emissions	Less Than Significant
Localized Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
Odors	Less Than Significant
B. CULTURAL RESOURCES	
Historic Resources	Less Than Significant
Archaeological Resources	Less Than Significant with Mitigation
C. ENERGY	
Construction	Less Than Significant
Operation	Less Than Significant
D. GEOLOGY AND SOILS	
Paleontological Resources	Less Than Significant with Mitigation
E. GREENHOUSE GAS EMISSIONS	
	Less Than Significant
F. LAND USE	
Physically Divide a Community	Less Than Significant
Conflict with Land Use Plans	Less Than Significant
G. NOISE	
Construction	
<i>On-Site Noise</i>	Significant and Unavoidable
<i>Cumulative On-Site Noise</i>	Significant and Unavoidable
<i>Off-Site Noise</i>	Less Than Significant
<i>Cumulative Off-Site Noise</i>	Significant and Unavoidable
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant with Mitigation
<i>On-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant
<i>Off-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable
<i>Cumulative Off-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable

Table I-1 (Continued)
Summary of Project Impacts

Environmental Issue	Project Impact ^a
Operation	
<i>On-Site Noise</i>	Less Than Significant
<i>Off-Site Noise</i>	Less Than Significant
H. PUBLIC SERVICES	
Fire Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Police Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Schools	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Libraries	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Parks and Recreation	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
I. TRANSPORTATION	
Conflict with Plans	Less Than Significant
Vehicle Miles Traveled	Less Than Significant
Hazardous Design Features	Less Than Significant
Emergency Access	Less Than Significant
J. TRIBAL CULTURAL RESOURCES	
	Less Than Significant
K. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Wastewater	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Energy Infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

**Table I-1 (Continued)
Summary of Project Impacts**

Environmental Issue	Project Impact ^a
<p>^a Cumulative impacts are listed separately if more severe than the corresponding Project impact or if the Project impact is significant and unavoidable but the cumulative impact is not. Source: Eyestone Environmental, 2020.</p>	

- Does the Project include air quality mitigation measures; or
- To what extent is Project development consistent with control measures?

(1) Criterion 1

With respect to the first criterion, as discussed under the analysis for Threshold (c), below, localized concentrations of NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} have been analyzed for the Project. SO₂ emissions would be negligible during construction and long-term operations, and, therefore, would not have the potential to cause or affect a violation of the SO₂ ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

Particulate matter is the primary pollutant of concern during construction activities, and, therefore, the Project's PM₁₀ and PM_{2.5} emissions during construction were analyzed in order to: (1) ascertain potential effects on localized concentrations; and (2) determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards for PM₁₀ and PM_{2.5}. As demonstrated in the analysis below (see Table IV.A-6 in Section IV.A, Air Quality, of this Draft EIR), the increases in PM₁₀ and PM_{2.5} emissions during construction would not exceed the SCAQMD-recommended significance thresholds at sensitive receptors in proximity to the Project Site.

Additionally, the Project's maximum potential NO_x and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table IV.A-6 in Section IV.A, Air Quality, of this Draft EIR, NO_x and CO would not exceed the SCAQMD-recommended LSTs. Therefore, Project construction would not result in a significant impact with regard to localized air quality.

Because the Project would not introduce any substantial stationary sources of emissions, CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.⁹ As indicated below, no intersections would require a CO hotspot analysis as they do not meet the threshold, and impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

As discussed below, an analysis of potential localized operational impacts from on-site activities was conducted. As demonstrated in the analysis below (see Table IV.A-7 in Section IV.A, Air Quality, of this Draft EIR), localized NO₂ as NO_x, CO, PM₁₀, and PM_{2.5} operational impacts would be less than significant. Therefore, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

(2) Criterion 2

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria, also listed above: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP control measures. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan and SCAG's RTP. As discussed at length in Section IV.F, Land Use, of this Draft EIR, the General Plan serves as a comprehensive, long-term plan for future development of the City. Refer to Subsection 3.c.(2)(b), City of Los Angeles Policies, below, for a discussion of the Project's consistency

⁹ SCAQMD, *CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, 1993.*

with applicable goals, objectives, and policies of the City's General Plan Air Quality Element.

The 2016–2040 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. As discussed in the Initial Study included as Appendix A of this Draft EIR, according to the 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2016 was approximately 3,954,629 persons.¹⁰ In 2023, the Project's anticipated occupancy year, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,145,604 persons.¹¹ Based on a household size factor of 2.42 persons per household for multi-family housing units, the Project is estimated to generate a residential population of 630 persons at full buildout.^{12,13} The estimated 630 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 2023.¹⁴

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.¹⁵ As discussed in the Initial Study included as Appendix A of this Draft EIR, 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.¹⁶ In 2023, the City of Los Angeles Subregion is anticipated to have approximately 1,834,339 employees.¹⁷ Thus, the Project's estimated 52 employees would

¹⁰ Based on a linear interpolation of 2012–2040 data.

¹¹ Based on a linear interpolation of 2012–2040 data.

¹² 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. As discussed further below, this rate still provides a conservative analysis.

¹³ $260 * 2.42 = \sim 630$ persons

¹⁴ $630 \div 190,975 = 0.33\%$

¹⁵ Based on employee generation factors provided in the 2018 LAUSD Developer Fee Justification Study, March 2018.

¹⁶ Based on a linear interpolation of 2012–2040 data.

¹⁷ Based on a linear interpolation of 2012–2040 data.

constitute approximately 0.07 percent of the employment growth forecasted between 2016 and 2023.¹⁸ Because the Project's resulting residential and employment growth would fall well within the growth forecasts for the City and similar projections form the basis of the 2016 AQMP, it can be concluded that the Project would be consistent with the projections in the AQMP. Please refer to Section IV.F, Land Use, of this Draft EIR, for additional discussion regarding the Project's consistency with the 2016–2040 RTP/SCS.

- Does the project implement feasible air quality mitigation measures?

As discussed below, the Project would not result in any significant air quality impacts and therefore would not require mitigation. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD, as summarized above. The Project also would incorporate project design features to support and promote environmental sustainability, as discussed earlier and detailed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. Specifically, Project Design Feature GHG-PDF-4 would prohibit the installation of fireplaces within the residential units. In addition, Project Design Feature TR-PDF-2 in Section IV.I, Transportation, of the Draft EIR requires that the Project prepare and implement a Transportation Demand Management (TDM) Program to reduce daily trip generation and peak hour vehicular traffic to and from the Project Site by 15 percent. While these features are designed primarily to reduce greenhouse gas emissions or traffic impacts, they would also serve to reduce the criteria air pollutants discussed herein. Furthermore, with compliance with the regulatory requirements identified above and in Section IV.E, Greenhouse Gas Emissions, no significant air quality impacts would occur. As such, the proposed Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the control measures set forth in the AQMP?

Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the integration of regional land use programs, measures, and strategies. The SCAQMD combines its portion of the Plan with those prepared by SCAG. The Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Transportation Control Measures (TCMs), included as Appendix IV-C of the 2016 AQMP/SIP for the Basin, are based on SCAG's Final 2016 RTP/SCS.

With regard to land use developments such as the Project, the 2016–2040 RTP/SCS land use control measures (i.e., goals and policies) focus on locating future

¹⁸ $52 \div 70,410 = 0.07\%$

growth within HQTAs and the reduction of vehicle trips and vehicle miles traveled (VMT). The Project would be designed and constructed with sustainability and transit orientation as guiding principles. The Project represents an infill development within an existing urbanized area that would concentrate new residential, commercial retail, and office uses within an HQTA. Therefore, the Project would be consistent with SCAG's 2016–2040 RTP/SCS, as it is located within an HQTA. As previously discussed, the Project Site is also located approximately 0.25 mile from the Hollywood/Vine Metro Red Line station and is served by eight Metro local lines and three Dash lines and one LADOT Commuter Express line. The Project would provide 35 short-term and 269 long-term bicycle parking spaces to further encourage biking. In addition, the Project would include electric vehicle infrastructure. As discussed further in Section IV.F, Land Use, of this Draft EIR, the Project has been designed to promote walkability and use of mass transit, given its location near employment opportunities, as well as retail/restaurant uses and other entertainment opportunities. As discussed in detail in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the 2016–2040 RTP/SCS includes, for the SCAG region as a whole, a daily 22.8 Total VMT per capita for the 2012 Base Year, and a daily 20.5 Total VMT per capita for the 2040 Plan Year. For Los Angeles County, the 2012 Base Year projected daily Total VMT per capita is 21.5 and 18.4 daily Total VMT per capita for the 2040 Plan Year. To analyze the Project's consistency with this aspect of the 2016–2040 RTP/SCS, the Project's Total Daily VMT was divided by the Project's service population to arrive at the Daily VMT per capita. As shown in Table IV.C-7 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project results in 9.5 Daily VMT per capita and is less than the Los Angeles County goals provided in the 2016–2040 RTP/SCS.¹⁹

The 2016–2040 RTP/SCS also provides a goal to reduce VMT by an estimated 18-percent in per capita GHG emissions from passenger vehicles by 2035 and 21-percent in per capita GHG emissions from passenger vehicles by 2040.²⁰ Project consistency with the VMT percent reduction goals provided in the 2016–2040 RTP/SCS was calculated using CalEEMod. CalEEMod includes VMT reduction measures for the Project Site relative to the standard VMT rates in CalEEMod consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*.²¹ CAPCOA guidance is

¹⁹ Using the Los Angeles Department of Transportation's VMT calculator, the Project would result in 3,423 VMT and a service population of 635, resulting in 5.4 VMT per capita (Refer to the VMT Memo included as Appendix O.2 of this Draft EIR). The analysis presented herein therefore represents a more conservative scenario.

²⁰ CARB updated the SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035. Implementation of the 2016 RTP/SCS or the next plan is expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's VMT and related GHG emission reduction goals.

²¹ CAPCOA, *Quantifying Greenhouse Gas Mitigation Measures*, 2010.

used to bridge the gap between the Project's aspects and the 2016–2040 RTP/SCS "control measures" which seek to reduce VMT.

While these Project characteristics primarily reduce greenhouse gas emissions, they also would reduce criteria air pollutants. These relative reductions in vehicle trips and VMT from a standard project within the Air Basin help quantify the criteria air pollutant emissions reductions achieved by locating the Project in an infill, HQT area that offers a number of alternative modes of transportation. CAPCOA VMT reduction measures within CalEEMod applicable to the Project Site include the following; a brief description of the Project's relevance to each measure is also provided:

- **CAPCOA Measure LUT-1—Increase Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The Project would result in a net increase of approximately 186 dwelling units per acre and 40 jobs per acre.
- **CAPCOA Measure LUT-3—Increase Diversity of Urban and Suburban Developments (Mixed-Uses):** The Project would introduce new uses on the Project Site, including new residential, commercial retail, and office uses. The Project would locate these uses in proximity to other existing off-site residential, office, retail, restaurant, and hotel uses. The increased land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation (i.e., walking and biking), which would result in corresponding reductions in transportation-related emissions.
- **CAPCOA Measure LUT-5—Increase Transit Accessibility:** The Project would be located approximately 0.25 mile from the Hollywood/Vine Metro Red Line station with, with service by eight Metro local lines, three DASH lines, and one LADOT Commuter Express line. The Project would also provide bicycle parking spaces for the proposed uses to encourage the use of alternative modes of transportation.
- **CAPCOA Measure LUT-9—Improve Design of Development:** The Project would remove most of the existing commercial buildings on-site and enhance the pedestrian environment by developing ground floor retail uses to foster pedestrian activity. The Project also would improve the streetscape on the Project Site's street frontages, thus making the site more attractive to pedestrians and enhancing walkability. The Project would include a high level of street access, which would improve street accessibility and connectivity.
- **CAPCOA Measure SDT-1—Provide Pedestrian Network Improvements:** The Project's design would improve pedestrian access by minimizing physical

barriers and linking the Project Site with external streets, thus encouraging people to walk or take mass transit instead of driving. These types of direct access to the Project Site would reduce VMT and associated transportation-related emissions.

As shown in Appendix C of this Draft EIR, incorporation of CAPCOA reduction measures (calculated internal to CalEEMod) results in approximately 67 percent reduction in the Project vehicular VMT as compared to a standard development within the Air Basin. This reduction in VMT is substantially better than the goals of the 2016–2040 RTP/SCS with an estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040.²² Implementation of these features would contribute to a reduction in air quality emissions via a reduction in VMT. Accordingly, as the Project would support SCAG's and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with the 2016–2040 RTP/SCS (control measures of the AQMP).

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the Project on air quality in the Air Basin. The Project represents an infill development near transit within an existing urbanized area that would concentrate new residential, commercial retail, and office uses within an HQTAs, thus reducing VMT. The Project would not have a significant long-term impact on the region's ability to meet state and federal air quality standards. The Project would comply with SCAQMD Rule 403 and would implement measures for control of NO_x, PM₁₀, and PM_{2.5}. Also, the Project would be consistent with the goals and policies of the AQMP for the control of fugitive dust. As discussed above, the Project's would be consistent with the goals and policies of the AQMP and, therefore, is considered consistent with SCAQMD's AQMP.

(ii) City of Los Angeles Policies

The Air Quality Element of the City's General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals.

²² CARB updated the SB 375 targets for the SCAG region, requiring a 19-percent decrease in VMT by 2035. Implementation of the 2016 RTP/SCS or the next plan is expected to fulfill and exceed the region's obligations under SB 375 with respect to meeting the State's VMT and related GHG emission reduction goals.

To achieve these goals, performance-based standards have been adopted to provide flexibility in implementation of the policies and objectives of the Air Quality Element. The following Air Quality Element goals, objectives, and policies are relevant to the Project:

Goal 2—Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Objective 2.1—It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

Policy 2.1.1—Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce Vehicle Trips and/or Vehicle Miles Traveled (VMT) as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.

Goal 4—Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Objective 4.1—It is the objective of the City of Los Angeles to include regional attainment of ambient air quality standards as a primary consideration in land use planning.

Policy 4.1.1—Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.

Objective 4.2—It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.

Policy 4.2.2—Improve accessibility for the City’s residents to places of employment, shopping centers, and other establishments.

Policy 4.2.3—Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

Policy 4.2.4—Require that air quality impacts be a consideration in the review and approval of all discretionary projects.

Policy 4.2.5—Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.

The Project would promote the General Plan Air Quality Element goals, objectives and policies, as discussed in Section IV.F, Land Use, of this Draft EIR. In particular, the Project includes 304 bicycle parking spaces (including 269 long-term spaces and 35 short-term spaces for the proposed residential, commercial retail, and office uses). In addition to bicycle parking, the Project would offer convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. In addition, the Project would be near transit options, including the Hollywood/Vine station of the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line located approximately 0.25 mile east of the Project Site and several bus lines with stops along Hollywood Boulevard near the Project Site. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops.

Based on the above, the Project would be consistent with applicable policies of the Air Quality Element. In addition, the Project would implement numerous sustainability features that would reduce vehicular trips, reduce VMT, and encourage use of alternative modes of transportation.

(iii) Conclusion

In conclusion, the analysis above was based on the Project's consistency with the AQMP as well as the City of Los Angeles policies. With regard to AQMP consistency, which is primarily concerned with the long-term influence of the Project on air quality in the Air Basin, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. As the Project would not exceed any of the state and federal standards, the Project would also not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, because the Project includes similar growth projections that form the basis of the 2016 AQMP, it can be concluded that the Project would be consistent with the projections in the AQMP. Furthermore, while the Project does not require any air quality mitigation measures, the Project would comply with all applicable regulatory standards and would incorporate the Project Design Features in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, that would serve to reduce the criteria air pollutants discussed herein. Additionally, as the Project would support the City's and SCAQMD's objectives of reducing VMT and the related vehicular air emissions, the Project would be consistent with AQMP control measures. **Thus, the Project would not conflict with or obstruct implementation of the AQMP. With regard to the City policies, as discussed above, the Project would serve to implement applicable policies pertaining to air quality. Based on the above, impacts with respect to conflict with plans would be less than significant.**

(b) Cumulatively Considerable Increases in Criteria Pollutants

(i) Regional Emissions

(1) Construction

As described in Section II, Project Description, of this Draft EIR, the Project is anticipated to be constructed in one primary phase, with no overlap of construction phases, beginning in 2021. The Project is scheduled to be built out by 2023.

Construction activities would require approximately 58,000 cubic yards of grading, which would be exported off-site to nearby landfills including Chiquita Canyon Landfill, Vulcan Landfill or Sunshine Canyon Landfill. For additional construction assumptions, see Appendix C, of this Draft EIR.

Project construction has the potential to generate air emissions through the use of heavy-duty construction equipment and vehicle trips by construction workers, haul trucks, and deliveries traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily NO_x, would result from the use of construction equipment during grading/excavation and foundation phases, such as dozers, loaders, and cranes. During the building finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

This analysis also conservatively assumes a round trip haul distance of 70 miles to the Chiquita Canyon Landfill, which is currently accepting clean soil. However, during construction, closer locations may be determined feasible (Vulcan Landfill in Sun Valley with a round trip length of 28 miles or Sunshine Canyon Landfill in Sylmar, with a round trip length of 40 miles, both of which accept clean soil), which would result in lower emissions for the Project.

The emissions levels in Table IV.A-5 in Section IV.A, Air Quality, of this Draft EIR represent the highest daily emissions projected to occur during each year of construction. As presented therein, construction-related daily maximum regional construction emissions (i.e., combined on-site and off-site emissions) without mitigation would not exceed the SCAQMD daily significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. **Therefore, regional construction emissions resulting from the Project would result in a less-than-significant impact.**

(2) Operation

As discussed above, SCAQMD's CalEEMod was used to calculate regional area, energy, mobile source, and stationary emissions. As also previously discussed, the Project would incorporate design features to support and promote environmental sustainability, as detailed further in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. While these features are designed primarily to reduce greenhouse gas emissions, they would also serve to reduce criteria air pollutants. For purposes of this analysis, project design features with a quantifiable effect on impacts include the Project's accessibility to transit and resulting increase in the diversity of land uses and density in the Project area. These are explained further in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.

Operational air quality impacts are assessed based on the incremental increase in emissions compared to baseline (existing) conditions. Therefore, the Project's operational emissions would subtract the existing emissions of the current use to determine the incremental increase. Table IV.A-6 in Section IV.A, Air Quality, of this Draft EIR provides the Project's incremental increase in operational emissions with incorporation of relevant design features. As shown therein, regional emissions resulting from operation of the Project would not exceed any of SCAQMD's daily regional operational thresholds. **Therefore, regional operational emissions resulting from the Project would be less than significant.**

(ii) Localized Emissions

(1) Construction

Project-related localized construction impacts are evaluated based on SCAQMD LST methodology which takes into account ambient pollutant concentrations. Based on SCAQMD methodology, localized emissions which exceed LSTs would also cause an exceedance of ambient air quality standards. As analyzed below, Project-related construction emissions would not exceed localized thresholds. **Therefore, localized construction emissions resulting from the Project would result in a less-than-significant air quality impact.**

(2) Operation

Project-related operational emissions were also evaluated based on SCAQMD LST methodology. While SCAQMD LST methodology evaluates emissions from on-site sources (e.g. water heaters, cooking appliances, HVAC), off-site sources such as Project-related vehicle trips were also evaluated for potential exceedances of ambient air quality standards. As analyzed below, Project-related operational emissions from on-site and off-site sources would not exceed localized thresholds. **Therefore, localized operational**

emissions resulting from the Project would result in a less-than-significant air quality impact.

(iii) Conclusion

With respect to the Project's construction-related air quality emissions and cumulative Air Basin-wide conditions, SCAQMD has developed strategies (e.g., SCAQMD Rule 403) to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal CAA mandates. The Project would comply with applicable regulatory requirements, including the SCAQMD Rule 403 requirements listed above. Per SCAQMD rules and mandates as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, all construction projects Air Basin-wide would comply with these same regulatory requirements and would implement all feasible mitigation measures when significant impacts are identified.

According to SCAQMD, individual projects that exceed the recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. As shown in Tables IV.A-5 and IV.A-6, respectively, in Section IV.A, Air Quality, of this Draft EIR, Project construction and operational daily emissions at the Project Site would not exceed any of SCAQMD's regional thresholds, respectively. Therefore, the Project's contribution to cumulative construction-related and operation-related regional emissions would not be cumulatively considerable and, therefore, would be less than significant. Similarly, as analyzed below, construction and operation of the Project would have less-than-significant impacts with regard to localized emissions as well. As such, the Project's contribution to cumulative air quality impacts due to localized emissions would also not be cumulatively considerable.

Therefore, the Project would not result in cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard; and impacts would be less than significant.

(c) Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

(i) Construction

(1) On-Site Construction Activities (Criteria Pollutants)

As discussed above in the methodology subsection, the localized construction air quality analysis was conducted using the methodology set forth by the SCAQMD. Look-up

tables provided by SCAQMD were used to determine localized construction emissions thresholds for the Project.²³ LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard and are based on the most recent background ambient air quality monitoring data (2016–2018) for the Project area presented on Table IV.A-2 in Section IV.A, Air Quality, of this Draft EIR. Although the trend shown in Table IV.A-2 demonstrates that ambient air quality is improving in the area, the localized construction emissions analysis conservatively did not apply a reduction in background pollutant concentrations for subsequent years of construction (i.e., 2021–2023). By doing so, the allowable pollutant increment to not exceed an ambient air quality standard is more stringent. This analysis is based on existing background ambient air quality monitoring data (2016–2018).

Maximum on-site daily construction emissions for NO_x, CO, PM₁₀, and PM_{2.5} were calculated using CalEEMod and compared to the applicable SCAQMD LSTs for SRA 1 based on construction site acreage of 1.4 acres. Potential impacts were evaluated at the closest off-site sensitive receptor, which are the student housing units located south of the Project Site. The closest receptor distance on the SCAQMD mass rate LST look-up tables is 25 meters. Based on SCAQMD LST methodology, projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters.²⁴

The maximum daily localized emissions from Project construction and LSTs are presented in Table IV.A-7 in Section A, Air Quality, of this Draft EIR. As presented therein, maximum construction emissions would not exceed the SCAQMD-recommended localized screening thresholds.

The Project's on-site construction activities, including the generation of criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations. As a result, Project-related construction activities would result in a less-than-significant impact with regard to localized emissions.

(2) Off-Site Construction Activities (Toxic Air Contaminants)

The greatest potential for TAC emissions during construction would be from diesel particulate emissions associated with heavy equipment operations. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in

²³ SCAQMD, *LST Methodology Appendix C-Mass Rate LST Look-up Table*, revised October 2009.

²⁴ SCAQMD, *Final Localized Significance Threshold Methodology*, revised July 2008.

terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology.²⁵ Given the short-term construction schedule of approximately 24 months, the Project would not result in a long-term (i.e., 70-year) source of TAC emissions. Additionally, the SCAQMD CEQA guidance does not require a HRA for short-term construction emissions. It is, therefore, not necessary to evaluate long-term cancer impacts from construction activities which occur over a relatively short duration. In addition, there would be no residual emissions or corresponding individual cancer risk after construction. **The Project’s off-site construction activities, including generation of TACs, would not expose sensitive receptors to substantial pollutant concentrations. Therefore, Project-related TAC impacts during construction would be less than significant.**

(ii) *Operation*

(1) On-Site Operational Activities (Criteria Pollutants)

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Emissions estimates for criteria air pollutants from on-site sources are presented in Table IV.A-8 in Section IV.A, Air Quality, of this Draft EIR. The SCAQMD LST mass rate look-up tables, which apply to projects that have active areas that are less than or equal to 5 acres in size, were used to evaluate potential localized impacts. As shown in Table IV.A-8, in Section IV.A, Air Quality, of this Draft EIR, on-site operational emissions would not exceed any of the LSTs. **The Project’s on-site operational activities, including generation of criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations. Therefore, localized operational emissions resulting from the Project would result in a less-than-significant air quality impact.**

(2) Off-Site Operational Activities (CO “Hot Spots” Analysis)

Consistent with the CO methodology above, if a project intersection does not exceed 400,000 vehicles per day, then the project does not need to prepare a detailed CO hot spot analysis.

At Project buildout, the highest average daily trips at an intersection would be approximately 65,000 at the Hollywood and Vine intersection, which is substantially below the daily traffic volumes that would be expected to generate CO exceedances, as

²⁵ SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, 2003.

evaluated in the 2003 AQMP.^{26,27} This daily trip estimate is based on the peak hour conditions of the intersection. There is no reason unique to the Air Basin meteorology to conclude that the CO concentrations at the Hollywood and Vine intersection would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP.²⁸ Therefore, the Project does not trigger the need for a detailed CO hotspots model and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant. The supporting data for this analysis is included in Appendix C of this Draft EIR. **The Project's off-site operational activities, including the highest average daily trips, would not expose sensitive receptors to substantial pollutant concentrations. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.**

(3) Toxic Air Contaminants

CARB has published and adopted the *Air Quality and Land Use Handbook: A Community Health Perspective*, which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities).²⁹ SCAQMD adopted similar recommendations in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.³⁰ Together, the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses. When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit TACs.

The primary sources of potential air toxics associated with Project operations include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent facility operations (e.g., natural gas fired boilers). However, these

²⁶ Gibson Transportation Consulting, *Transportation Impact Study for the Hollywood and Wilcox Project, Hollywood, California, June 2018. Refer to Appendix O.1 of this Draft EIR.*

²⁷ *The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent 1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day.*

²⁸ *It should be noted that CO background concentrations within the vicinity of the modeled intersection have substantially decreased since preparation of the 2003 AQMP. In 2003, the 1-hour background CO concentration was 5 ppm and has decreased to 2 ppm in 2014.*

²⁹ CARB, *Air Quality and Land Use Handbook, a Community Health Perspective, April 2005.*

³⁰ SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 6, 2005.*

activities, and the land uses associated with the Project, are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. It should be noted that the SCAQMD recommends that health risk assessments (HRAs) be conducted for substantial individual sources of DPM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing mobile source diesel emissions. Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of DPM warranting a refined HRA since daily truck trips to the Project Site would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit diesel particulate emissions.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under California Accidental Release Program.

As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

(d) Generation of Odors

As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, and in the Initial Study prepared for the Project, which is included as Appendix A of this Draft EIR, the Project would not create objectionable odors impacting a substantial number of people. **Impacts would be less than significant.**

(2) Cultural Resources

(a) Historical Resources

(i) Direct Impacts

The only historic resource on the Project Site is the Attie Building. As the buildings located at 6430–6434 Hollywood Boulevard, 1624–1626 Wilcox Avenue, and 1636–1644 Wilcox Avenue have been identified as ineligible for designation, either individually or as part of the Hollywood Boulevard Commercial and Entertainment District, demolition of such buildings would not constitute a direct impact on historic resources.

As discussed in detail in the Cultural Resources Report, rehabilitation of the Attie Building and restoration of the storefronts would conform to Secretary of the Interior's Standards for Rehabilitation. Specifically, in conformance with Standard for Rehabilitation No. 1, the Attie Building would be used as it was historically, with retail on the ground floor and offices on the second floor. In conformance with Standard for Rehabilitation No. 2, the historic character of the building would be retained and preserved. No distinctive materials would be removed; rather, contemporary materials, such as contemporary signage, would be removed to reveal historic material. Through study of historic photographs and extensive non-destructive testing, the Project would provide for accurate composition of the storefronts from the 1931–1939 period of significance. While there is some evidence of deeply inset display windows at the east storefront, these alterations likely occurred in the late 1940s. This alteration is outside the period of significance and has not taken on significance over time. Similarly, interior retail spaces do not retain any distinctive materials. Furthermore, in conformance with Standard for Rehabilitation No. 3, no changes would be added that create a false sense of historic development. Restoration of storefronts would be based on careful study of historic photographs (see specifically Historic Photographs 1–6 in Attachment D of the Cultural Resources Report included as Appendix D.1 of this Draft EIR). In conformance with Standard of Rehabilitation No. 4, changes to the property that have acquired historic significance, specifically the mural along the west elevation, would be retained and preserved. In conformance with Standard of Rehabilitation No. 5, distinctive materials, including the terra cotta cladding, would be preserved, cleaned, and repaired as necessary. In addition, window sash and frames would be stripped of paint, repaired as necessary, and painted a color from the building's period of significance. In conformance with Standard of Rehabilitation No. 6, deteriorated historic features, such as missing spandrel panels behind contemporary signage, would be replaced to match the existing spandrel panels in design, material, color, and texture. In conformance with Standard of Rehabilitation No. 7, the building would be cleaned using the gentlest means possible. In conformance with Standard of Rehabilitation No. 9, new

masonry storefront surrounds would be compatible with other materials used throughout the building but differentiated from the old.³¹

Removal of a non-contributing resource and construction of a new, one-story commercial building adjacent to the Attie Building at 6430–6434 Hollywood Boulevard, would also conform with the Secretary’s Standards and would not have a direct impact on the Hollywood Boulevard Commercial and Entertainment District. As noted above, due to multiple and substantial alterations, the building at 6430–6434 Hollywood Boulevard does not retain any semblance to how it looked historically when it was constructed in 1931, or even from any other date during the period of significance for the Hollywood Boulevard historic district. In fact, due to these alterations, the building at 6430–6434 Hollywood Boulevard no longer has any visual relationship to its earlier appearance and can be read as having had a damaging impact on the historic district.³² Rehabilitation standards 9 and 10 deal specifically with new additions and the proposed new building at 6430–6434 Hollywood Boulevard meets both standards. The new building is proposed to be compatible with surrounding retail buildings, specifically the Attie Building, in size, scale, proportion, and massing, in conformance with Standard 9. The building would align in height with the Attie Building and the rhythm of three bays separated by pilasters is informed by the Attie Building. However, the design is contemporary, differentiating it from surrounding historic buildings and not competing architecturally with contributing resources to the historic district. In addition, in conformance with Standard 10, the new building could be removed in the future without destroying the essential form and integrity of the historic district.

Therefore, the Project would not directly impact or cause a substantial adverse change in the significance of the Attie Building. Rather, rehabilitation of the Attie Building, and restoration of the storefronts and other missing features, would have a beneficial impact on the building, as well as the Hollywood Boulevard Commercial and Entertainment District as a whole by restoring a lost feature. As many historic storefronts have been substantially altered on Hollywood Boulevard, restoration of the storefronts at the Attie Building would serve as an example to other buildings. Accordingly, direct impacts to historic resources would be less than significant.

³¹ *Standard of Rehabilitation No. 8, which focuses on archaeology, and Standard of Rehabilitation No. 10, which focuses on additions, do not apply to rehabilitation of the Attie Building.*

³² *See historic photographs in Attachment D of the Cultural Resources Report included as Appendix D.1 of this Draft EIR.*

(ii) Indirect Impacts

As the proposed development consists of new construction immediately adjacent to identified historic resources, specifically the Hollywood Boulevard Commercial and Entertainment District as a whole and the Attie Building specifically, there is the potential for indirect impacts to the setting of historical resources. In general, CEQA describes an indirect impact as one that results from the "...alteration of the resource or its immediate surroundings such that the significance of an historical resources would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1)). For the Project to have an indirect impact, it would have to destroy the setting to such a degree that the Attie Building would no longer be eligible as a contributing resource to the historic district.

Within the vicinity of the Project Site, Hollywood Boulevard consists of commercial and mixed-use buildings that vary greatly in height (i.e., from one to 12 stories). In addition, the new 10-story Dream Hotel development was recently completed located near the Project Site, mid-block on Selma Avenue between Wilcox Avenue and Cahuenga Boulevard. While the Project's proposed new building along Wilcox Avenue would also be considered tall with 11 to 15 stories, it would not be out of scale with the varied heights along Hollywood Boulevard. Such varied heights are attributed to contributing resources to the National Register District, including the radio towers atop the Hollywood Pacific Theater across Hollywood Boulevard from the Project Site, the seven-story Security Trust Building at the northeast corner of Hollywood Boulevard and Cahuenga Boulevard, and the 12-story Guaranty Building near the northeast corner of Hollywood Boulevard and Ivar Avenue. Furthermore, the Project's proposed new building along Wilcox Avenue would step back from Hollywood Boulevard by constructing the tallest section at the south side of the building. Given the slope of the topography down to the south, this proposed new building would not appear taller than surrounding buildings and would not alter the varied pattern of building heights in the area. The proposed building along Wilcox Avenue would also be set apart from the Attie Building by an alley.

In addition, the proposed building would be compatible with proportions and design elements of the Attie Building. The building would continue the height of the cornice above the storefronts along Wilcox Avenue and along the cornice line of the storefronts of the new building. The paired floors of the building would be approximately the same height as the second floor of the Attie Building, which would further create visual continuity. Vertical elements of the new building would also provide continuity from the fluted terra cotta pilasters of the Attie Building. By breaking up the mass through both strong horizontal elements and colorful vertical elements, the building would not destroy the spatial relationships that characterize the Hollywood Boulevard Commercial and Entertainment District or the Attie Building, in conformance with Standard of Rehabilitation No. 9. In conformance with Standard of Rehabilitation No. 3, the proposed new building would provide a contemporary design that would not create a false sense of historic development.

As in the Cultural Resources Report included as Appendix D.1 of this Draft EIR, the United States Post Office, Hollywood Station, which is individually listed in the National Register, is also one partial block south of the Project Site at the northwest corner of Wilcox Avenue and Selma Avenue. As the Post Office is significant for its architecture and signifies the federal government's recognition of Hollywood, the surrounding environs is not considered a character-defining feature of the property. Thus, such significance is unrelated to the relationship of the building to surrounding buildings. Moreover, the Post Office is surrounded by surface parking on two sides and is separated from the Project Site by Wilcox Avenue. Therefore, the Project's new one-story commercial building immediately adjacent to the Attie Building and the proposed 11- to 15-story, mixed-use building along Wilcox Avenue, which are also some distance to the north, would not pose an indirect impact to the setting of the Post Office as a historical resource.

(iii) Conclusion

Based on the above, the Project would rehabilitate and restore the Attie Building in conformance with the Secretary of the Interior's Standards, while the proposed new development on Hollywood Boulevard and Wilcox Avenue would also conform with such standards. The Project would not adversely affect the significance of the Attie Building, the only historic resource on the Project Site, and would instead provide a beneficial impact to the building and the Hollywood Boulevard Commercial and Entertainment District through rehabilitation of the building and restoration of the storefronts and other missing features. In addition, the Project's development adjacent to the Attie Building and along Wilcox Avenue would not materially alter historic resources and impair their eligibility as such resources. Specifically, the new building on Hollywood Boulevard, located at 6430–6434 Hollywood Boulevard, conforms with the Secretary of the Interior's Standards 9 and 10, addressing new construction. **As such, the Project would not cause direct or indirect impacts to historic resources, including the Hollywood Boulevard Commercial and Entertainment District. Impacts to historic resources would be less than significant, and no mitigation is required.**

(b) Human Remains

As discussed in Section VI, Other CEQA Considerations, and in the Initial Study (Appendix A of this Draft EIR), the Project Site is located within an urbanized area and has been subject to previous grading and development. No known traditional have burial sites been identified on the Project Site. Nonetheless, as the Project would require excavation at depths greater than those having previously occurred on the Project Site, the potential exists for the Project to uncover human remains. If human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with PRC Section 5097.91 and

5097.98, as amended. **Impacts would be less than significant and no mitigation measures are required.**

(3) Energy

(a) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

The Draft EIR analysis considers the eight criteria identified in the Thresholds of Significance subsection in Section IV.C, Energy to determine whether the Project would result in wasteful, inefficient, or unnecessary consumption of energy resources.

- (i) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed*

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operations, maintenance, and removal activities).³³

For purposes of the Draft EIR analysis, Project maintenance would include activities such as repair of structures, landscaping, and application of architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Removal of Project activities of the structures constructed under this Project would include the future demolition or abandonment of the Project as proposed.³⁴ However, as it is not known when the Project would be removed, the analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

(1) Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Electricity from these construction activities would be limited in comparison to existing operational electricity on the Project Site given that construction activities would be intermittent and use of heating and cooling equipment would also be

³³ *Removal activities relate to the life of a project.*

³⁴ *Removal activities relate to the life of a project.*

used intermittently. The Project would also implement Project Design Feature AIR-PDF-1 which would require use of electricity from power poles or solar generators during construction. As a conservative assumption, electricity used for construction activities was assumed to be obtained through power poles. As discussed below, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities), which together are described as “On-road construction equipment” in Table IV.C-1 in Section IV.C, Energy, of this Draft EIR.

As shown in Table IV.C-1, a total of 48.7 MWh of electricity, 89,295 gallons of gasoline, and 116,644 gallons of diesel is estimated to be consumed during Project construction. Project construction is expected to be completed by 2023.

(a) Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by existing electrical services within the Project Site and would not affect other services. This would be consistent with suggested measures in the *L.A. CEQA Thresholds Guide* to use electricity from power poles rather than temporary gasoline or diesel powered generators pursuant to Project Design Feature AIR-PDF-1.

As shown in Table IV.C-1, in Section IV.C, Energy, of this Draft EIR, a total of approximately 48.7 MWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing illumination for the site and staging areas would also comply with applicable Title 24 requirements which includes limits on the wattage allowed per specific area, which result in the conservation of energy.³⁵ As such, the demand for electricity during construction would not cause wasteful, inefficient, and unnecessary use of energy.

³⁵ *California Building Energy Efficiency Standards, Title 24, Part 6, §110.9, §130.0, and §130.2.*

(b) Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no demand generated by construction.

(c) Transportation Energy

The petroleum-based fuel use summary provided above in Table IV.C-1 in Section IV.C, Energy, of this Draft EIR represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions provided in Appendix E of this Draft EIR. As shown, 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 the 2021 (construction start year) annual on-road gasoline-related energy consumption in Los Angeles County, and 0.009 percent of the 2021 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix E, of this Draft EIR.

Trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. In addition, on-road vehicles (i.e., haul trucks, worker vehicles) would be subject to Federal fuel efficiency requirements. Therefore, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not cause wasteful, inefficient, and unnecessary use of energy.

(2) Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, development of the Project would result in an increase of 1,289 MWh electricity per year, an increase of 2,837,146 cf of natural gas per year, and an increased consumption of 78,854 gallons of gasoline per year and 14,262 gallons of diesel fuel per year over baseline conditions.

(a) Electricity

As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, with compliance with applicable CALGreen requirements and GHG-PDF-1 through GHG-PDF-4, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 1,289 MWh/year, which is equivalent to an average of 209 kW or a peak of 378 kW.³⁶

In addition to complying with CALGreen requirements, the Project Applicant would also implement Project Design Feature GHG-PDF-1 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, which states that the Project would optimize energy performance and reduce building energy cost by 22 percent for new/remodeled construction compared to the LEED® baseline of ASHRAE 90.1-2010. This analysis conservatively assumes no reduction in energy in comparison to 2016 Title 24 Building Standards Code. In addition, the Project would use Energy Star-labeled products and appliances, and use light-emitting diode (LED) lighting where appropriate, to reduce electricity use. Additionally, Project Design Features GHG-PDF-2 were implemented to reduce Project-related GHG emissions by encouraging use of electric vehicles. Project Design Feature GHG-PDF-2 would result in at least 20 percent of the total parking spaces provided on the Project Site be capable of supporting electric vehicle supply equipment (EVSE) and states that the Project would provide 10 percent of the parking spaces with EV charging stations. It is anticipated that these measures would marginally increase usage of electricity, but that any additional electricity usage would be offset by energy savings of gasoline and diesel from the electric vehicles using the equipment. Electric vehicles typically have a higher MPGe (miles per gallon gasoline equivalent) compared to liquid-fueled (gasoline, diesel) vehicles with an MPGe rating ranging from 48 to 136 MPGe.³⁷ When compared to the current average fuel economy of 21.6 MPG, energy usage from EV charging would be offset by energy savings of liquid-fueled vehicles.³⁸ Furthermore, Project Design Feature GHG-PDF-3 would require the Project to provide a minimum of 105 kilowatts of photovoltaic panels on the Project Site. As discussed in Section II, Project Description, of this Draft EIR, the Project would include measures to promote capture and reuse rainwater for irrigation and landscaping; reduce energy usage through a variety of measures including solar passive design, daylight harvesting, natural ventilation, and thoughtful building orientation. The Project would also implement Project Design Feature

³⁶ *California Public Utilities Commission. 2017 System Efficiency of California's Electric Grid. Peak Demand and Load Factors. Note, kW or MW is a measure of power or flow of electricity. A kWh or MWh is a measure of energy where one kWh is equal to one kW operating for one hour.*

³⁷ *United States Department of Energy, 2019 Fuel Economy, <https://afdc.energy.gov/vehicles/search/results.csv?current=true>, accessed January 17, 2020.*

³⁸ *United States Environmental Protection Agency, Green Vehicle Guide, Technology, www3.epa.gov/otaq/gvg/learn-more-technology.htm, accessed January 17, 2020.*

WAT-PDF-1, presented in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, which states that the Project would implement water conservation features (e.g., high-efficiency clothes washers and no-flush or waterless urinals) to reduce indoor water use by 35 percent and outdoor water use by 30 percent.

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2023–2024 fiscal year (the Project's full buildout year) will be 23,033 GWh of electricity.^{39,40} As such, the Project-related net annual electricity consumption of 1,289 MWh/year would represent approximately 0.01 percent of LADWP's projected sales in 2023 (the Project's full buildout year). In addition, as previously described, the Project would incorporate a variety of energy conservation measures to reduce energy usage.

(b) Natural Gas

As provided in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 2,837,146 cf/year. In addition, the Project Applicant would implement Project Design Feature GHG-PDF-1 in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, which states that the Project would optimize energy performance and reduce building natural gas cost by 22 percent for new/remodeled construction compared to the LEED® baseline of ASHRAE 90.1-2010. This analysis conservatively assumes no reduction in natural gas in comparison to 2019 Title 24 Building Standards Code.

As stated above, the Project's estimated net annual demand for natural gas is 2,837,146 cf/year, or approximately 7,773 cf/day. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.50 billion cf/day in 2023 (the Project's full buildout year).⁴¹ The Project would account for approximately 0.0003 percent of the 2023 (the Project's full buildout year) forecasted consumption in SoCalGas' service area.

³⁹ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

⁴⁰ LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

⁴¹ California Gas and Electric Utilities, 2018 California Gas Report p. 100. Interpolated between 2022 and 2025 estimates.

(c) Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As discussed in Section IV.I, Transportation, of this Draft EIR, the Project Site is located in an area well-served by public transit. Specifically, the Project Site will be located approximately 0.25 mile from the Metro Red Line Hollywood/Vine Station as well as bus lines on Hollywood Boulevard that would encourage and support use of public transportation. Furthermore, the Project would provide 304 bicycle parking spaces, in addition to bicycle-serving amenities, which would further encourage biking. Additionally, the Project Site was designed to encourage walkability.

The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard Institute of Transportation Engineers (ITE) trip generation rates. Specifically, the Project characteristics listed below are consistent with the California Air Pollution Control Officers Association (CAPCOA) guidance document, *Quantifying Greenhouse Gas Mitigation Measures*,⁴² which identifies the VMT and vehicle trips reductions for the Project Site relative to the standard trip and VMT rates in CalEEMod, which corresponds to reduction relative GHG emissions. Measures applicable to the Project include the following; a brief description of the Project's relevance to the measure is also provided:

- **CAPCOA Measure LUT-1—Increase Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The Project would increase the Site density from zero dwelling units per acre to 186 dwelling units per acre. Job density would decrease slightly from 56 jobs per acre to 40 jobs per acre.
- **CAPCOA Measure LUT-3—Increase Diversity of Urban and Suburban Developments (Mixed-Uses):** The Project would introduce new uses on the Project Site, including *new* residential, retail, and office uses. The Project would locate complementary new residential, retail and office uses in proximity to other existing off-site residential, office, retail, restaurant, and hotel uses. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation (i.e., walking and biking), which would result in corresponding reductions in transportation-related emissions.

⁴² CAPCOA, *Quantifying Greenhouse Gas Mitigation Measures*, 2010.

- **CAPCOA Measure LUT-5—Increase Transit Accessibility:** The Project Site will be located approximately 0.25 mile from the Metro Red Line Hollywood/Vine Station as well as 12 bus lines on Hollywood Boulevard that would encourage and support use of public transportation. The Project would also provide bicycle parking spaces for the proposed uses to encourage utilization of alternative modes of transportation.
- **CAPCOA Measure LUT-9—Improve Design of Development:** The Project would add community-serving retail and restaurant uses along Hollywood Boulevard. Additional retail and restaurant uses as well as residential amenities including a lobby area and lounge would be located along Wilcox Avenue. An outdoor courtyard, which could be used as an outdoor seating/dining area for a restaurant, would also be incorporated to the north of the commercial use at ground-level along Wilcox Avenue and would be publicly accessible during business hours. The Project would include a high level of street access, which improves street accessibility and connectivity.
- **CAPCOA Measure SDT-1—Provide Pedestrian Network Improvements:** Project design would provide pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets to encourage people to walk instead of drive. The Project would provide several improvements, such as direct access to the existing off-site pedestrian network including existing off-site sidewalks along Hollywood Boulevard and Wilcox Avenue, to encourage and increase pedestrian activities in the area, which would further reduce VMT and associated transportation-related emissions.
- **CAPCOA Measure SDT-2—Traffic Calming Measures:** The Project would be located in an area with traffic calming measures to encourage people to walk or bike instead of using a vehicle. This mode shift results in a decrease in VMT. Streets within 0.5 mile of the Project Site are equipped with sidewalks.

A transportation demand management (TDM) program, as required by TR-MM-1, provided in Section IV.I, Transportation, of this Draft EIR, would also be implemented to reduce the use of single occupant vehicles by increasing the number of trips by walking, bicycle, carpool, vanpool, and transit. The TDM program would include design features, transportation services, education, and incentives intended to reduce the amount of single occupant vehicles during commuter peak hours. The TDM program is discussed further in Section IV.I, Transportation, of this Draft EIR.

The combined effect of the various strategies implemented as part of the TDM program would result in a 15-percent reduction in daily trip generation by offering services,

actions, specific facilities, etc., aimed at encouraging use of alternative transportation modes (e.g., transit, bus, walking, bicycling, carpool, etc.).⁴³

As summarized in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, when accounting for the measures that would be implemented to reduce VMT, the Project's estimated net petroleum-based fuel usage would be approximately 78,854 gallons of gasoline and 14,262 gallons of diesel per year, or a total of 93,116 gallons of petroleum-based fuels annually. This would be a 67-percent reduction in petroleum-based fuel usage in comparison to a standard project as estimated by CalEEMod.

(3) Summary of Energy Requirements and Energy Use Efficiencies

CEQA Guidelines Appendix F recommends quantification of a project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of a project's life cycle including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed. The Project's energy requirements were calculated based on the methodology contained in CalEEMod for electricity and natural gas usage. Project VMT data was calculated based on CAPCOA guidelines. The calculations also took into account energy efficiency measures such as Title 24, CalGreen, and vehicle fuel economy standards. Table IV.J-2 in Section IV.J, Tribal Cultural Resources, of this Draft EIR provides a summary of Project construction and operational energy usage, respectively. During Project construction activities, a total of 48.7 MWh of electricity would be consumed along with 116,644 gallons of transportation fuel (gasoline and diesel). During Project operations, a total of 1,289 MWh of electricity, 2,837,146 cf of natural gas, and 93,116 gallons of transportation fuel would be consumed on an annual basis.

(ii) The effects of the project on local and regional energy supplies and on requirements for additional capacity

(1) Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in

⁴³ LADOT reviewed and approved a 5 percent TDM program as part of the Project's Traffic Study on July 25, 2018. Subsequent to that approval, the TDM program was increased to 15 percent as part of the Project's AB 900 application. Refer to Appendix O.2 of this Draft EIR for LADOT's approval of the Traffic Study and Appendix B of this Draft EIR for the Project's AB 900 certification.

use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents approximately 4 percent of the estimated net annual operational demand which, as discussed below, would be within the supply and infrastructure service capabilities of LADWP.⁴⁴ Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses, which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.001 percent of gasoline usage and 0.009 percent of diesel usage within Los Angeles County, respectively. As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period. Construction impacts on energy usage would be less than significant.

(2) Operation

Based on LADWP's 2017 Power Strategic Long-Term Resources Plan, LADWP forecasts that its total energy sales in the 2023–2024 fiscal year (the Project's full buildout year) will be 23,033 GWh of electricity.^{45,46} As such, the Project-related net annual electricity consumption of 1,503 MWh/year would represent less than 0.1 percent of LADWP's projected sales in 2023 (the Project's full buildout year). In addition, LADWP has confirmed that the Project's electricity demand can be served by the existing facilities in the Project area.⁴⁷ Furthermore, the Project would implement any necessary connections and upgrades required by LADWP to ensure that LADWP would be able to adequately serve the Project.

As energy consumption during Project operations would be relatively negligible and energy requirements are within LADWP's and SoCalGas' service provision, Project operational impacts on energy usage would be less than significant.

⁴⁴ The percentage is derived by taking the total amount of electricity usage during construction (48,730 kWh) and dividing that number by the total amount of net electricity usage during operation (1,289,062 kWh) to arrive at four percent.

⁴⁵ LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.

⁴⁶ LADWP, 2017 Power Strategic Long-Term Resources Plan, December 2017, Appendix A, Table A-1.

⁴⁷ LADWP, Will serve letter from Antoine S. Raad, dated March 8, 2018. Provided in the Project's Utility Report included as Appendix F of this Draft EIR

(iii) The effects of the project on peak and base period demands for electricity and other forms of energy

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, the LADWP power system experienced an all-time high peak of 6,432 MW on August 31, 2017.⁴⁸ LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2017, the base case peak demand for the power grid is 5,854 MW.⁴⁹ As discussed above, the Project would consume 1,289 MWh on an annual basis which is equivalent to an average of 209 kW or a peak of 378 kW.⁵⁰ In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.007 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to account for future electrical demand by the Project. Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid. Project operational impacts with regard to baseline and peak load electricity usage would be less than significant.

(iv) The degree to which the project complies with existing energy standards

Construction equipment would comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.⁵¹ Electricity and natural gas usage during Project operations presented in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR would comply with 2019 Title 24 standards and applicable 2019 CalGreen requirements. In addition, through implementation of Project Design Feature GHG-PDF-1, the Project would optimize energy performance and reduce building energy cost by 22 percent for new/remodeled construction compared to the LEED® baseline of ASHRAE 90.1-2010. This analysis conservatively assumes no reduction in energy in comparison to 2019 Title 24 Building Standards Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well

⁴⁸ LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.

⁴⁹ LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.

⁵⁰ California Public Utilities Commission, Report: System Efficiency of California's Electric Grid, 2017.

⁵¹ Energy Independence and Security Act of 2007. Pub.L. 110-140.

as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles traveling to and from the Project Site are assumed to comply with CAFE fuel economy standards, as required.

Based on the above, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage, as well as transportation fuel consumption.

(v) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. The LADWP's most recently adopted 2017 Power Strategic Long-Term Resources Plan identifies adequate resources (i.e., natural gas, coal, and renewables) to support future generation capacity.

Natural gas supplied to Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.⁵² According to the U.S. Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2015 consumption.⁵³ Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.⁵⁴ The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

⁵² *California Gas and Electric Utilities, 2018 California Gas Report.*

⁵³ *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed January 17, 2020.*

⁵⁴ *BP Global, Oil reserves, www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil.html#oil-reserves, accessed January 17, 2020.*

One of the objectives of SB 350 is to increase procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. However, as of September 2018, SB 100 was signed, which would require retail sellers of electric services to increase procurement from eligible renewable energy resources to 50 percent renewable resources target by December 31, 2026, and 60 percent by December 31, 2030. Accordingly, LADWP is required to procure at least 60 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 32 percent of LADWP's overall energy mix in 2018, the most recent year for which data are available.⁵⁵ This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, as discussed in Section II, Project Description, of this Draft EIR, the Project would include Project Design Feature GHG-PDF-3 which would require the Project to provide a minimum of 105 kilowatts of photovoltaic panels on the Project Site. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, while methane is a renewable derived biogas and was found beneath the Project Site, it is not available on the Project Site in commercially viable quantities or form, and its extraction and treatment for energy purposes would result in secondary impacts. Additionally, wind-powered energy is not viable on the Project Site due to the lack of sufficient wind in the Los Angeles basin. Specifically, based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential.⁵⁶

(vi) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives

The Project would include project features to reduce VMT during operational activities. The Project's proximity to job centers and retail uses would allow for more residents to live closer to work and shopping areas, reducing VMT. The Project would be located approximately 0.25 mile from the Metro Red Line Hollywood/Vine Station as well as bus lines on Hollywood Boulevard that would encourage and support use of public transportation. The Project would also provide 269 long-term and 35 short-term bicycle parking spaces for the proposed uses to encourage utilization of alternative modes of

⁵⁵ CEC, *Utility Annual Power Content Labels for 2018*.

⁵⁶ CEC, *California Wind Projects and Wind Resource Areas 2018 map*.

transportation. As further discussed in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, these measures would reduce VMT by approximately 67 percent in comparison to a Project without Reduction Features as estimated by CalEEMod, with a corresponding reduction in the Project's petroleum-based fuel usage. In addition, TDM program, as required by TR-PDF-2, provided in Section IV.I, Transportation, of this Draft EIR, would also be implemented to reduce the use of single occupant vehicles by increasing the number of trips by walking, bicycle, carpool, vanpool, and transit. The TDM program would include design features, transportation services, education, and incentives intended to reduce the amount of single occupant vehicles during commuter peak hours. Therefore, the Project would encourage the use of efficient transportation alternatives.

(vii) The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements

The current City of Los Angeles Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). In addition to compliance with the City's Green Building Code, the Project would optimize energy performance and reduce building energy cost by 22 percent for new/remodeled construction compared to the LEED® baseline of ASHRAE 90.1-2010. Therefore, the Project would incorporate measures that are above and beyond current State and City energy conservation requirements.

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy-intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

With implementation of these features along with complying with state and local energy efficiency standards, the Project would meet and/or exceed all applicable energy conservation policies and regulations.

(viii) Whether the Project conflicts with adopted energy conservation plans

As discussed in Section IV.E, Greenhouse Gas Emissions, the city has published the LA Green Plan/ClimateLA in 2007 which outlines goals and actions by the City to

reduce GHG emissions. To facilitate implementation of the LA Green Plan/Climate LA, the City adopted the Green Building Code. The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2016 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed above and in Section IV.F, Land Use, of this Draft EIR, SCAG's 2016–2040 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region.

The 2016–2040 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT. The Project would be consistent with the energy efficiency policies emphasized in the 2016–2040 RTP/SCS. Most notably, the Project represents an infill development within the City of Los Angeles that would concentrate new residential, community-serving retail, office, and restaurant uses within an HQTAs as defined by the 2016–2040 RTP/SCS (see Section IV.F, Land Use, of this Draft EIR for further details). The Project would be located approximately 0.25 mile from the Metro Red Line Hollywood/Vine Station as well as bus lines on Hollywood Boulevard that would encourage and support use of public transportation. Development of the Project within an HQTAs would encourage the use of transit and reduce the transportation fuel associated with VMT.

The introduction of new housing and job opportunities within an HQTAs, as proposed by the Project, is consistent with numerous policies in the 2016–2040 RTP/SCS related to locating new housing and jobs near transit. The 2016–2040 RTP/SCS would result in an estimated 8-percent decrease in VMT by 2020, an 18-percent decrease in VMT by 2035, and a 21-percent decrease in VMT by 2040.⁵⁷ By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21-percent decrease in VMT by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Subsequent to adoption of the 2016–2040 RTP/SCS, CARB adopted in 2018 a new target requiring a 19-percent decrease in VMT for the SCAG region by 2035. It is expected that this new target will be incorporated into the next RTP/SCS. The 2016–

⁵⁷ SCAG, *Final 2016–2040, RTP/SCS, April 2016*.

2040 RTP/SCS and/or the next RTP/SCS are therefore expected to fulfill and exceed SB 375 compliance with respect to meeting the State's GHG emission reduction goals.

Thus, consistent with the 2016–2040 RTP/SCS, the Project would reduce VMT by 67 percent in comparison to a Project without Reduction Features as estimated by CalEEMod, and, consequently, the Project's petroleum-based fuel usage would be reduced by 67 percent, as discussed further in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR. These VMT reducing measures are also consistent with the goals of the Sustainable City pLAN/L.A.'s Green New Deal which targets GHG emissions generated by City owned buildings and properties. Although the Sustainable City pLAN/LA's Green New Deal targets City generated GHG emissions, the Project would also comply with or not conflict with measures to reduce GHG emission. In addition, as previously discussed, the Project would exceed state energy efficiency requirements and would use electricity from LADWP, which has a current (2017) renewable energy mix of 30 percent. All of these features would serve to reduce the consumption of electricity, natural gas, and transportation fuel. Based on the above, the Project would be consistent with adopted energy conservation plans.

(ix) Conclusion

As demonstrated in the analysis above, the Project would not result in potentially significant environmental impact due to wasteful, inefficient, and unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during base and peak periods would be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would be sufficient to meet the needs of Project-related construction and operational activities. During operations, the Project would comply with existing energy efficiency requirements such as CalGreen as well as include energy conservation measures beyond requirements. **In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use would be less than significant during construction and operation.**

(b) Conflicts with Plans for Renewable Energy or Energy Efficiency

As discussed in Subsection 3.c(2)(h) above, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen building code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of Los Angeles Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. In addition, the Project would implement measures to exceed Title 24 energy efficiency requirements.

With regard to transportation related energy usage, the Project would comply with goals of the SCAG's 2016 RTP/SCS which incorporates VMT targets established by SB 375. The Project's mixed-use development and proximity to major job centers and public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations.

Based on the above, the Project would not conflict with adopted energy conservation plans, or violate state or federal energy standards. **Therefore, Project impacts associated with regulatory consistency would be less than significant.**

(4) Greenhouse Gas Emissions

(a) Consistency with Applicable Plans and Policies

Compliance or consistency with applicable GHG emissions reduction plans would result in less-than-significant project and cumulative impacts. The following section describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in the 2008 Climate Change Scoping Plan and subsequent updates, the 2016–2040 RTP/SCS, AB 900, and the Sustainable City pLAn/L.A.'s Green New Deal. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

(i) Climate Change Scoping Plan

Project GHG emissions have been quantified, and as shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project would result in a net increase of 1,042 MTCO_{2e} annually. The breakdown of emissions by source category shows less than 1 percent from area sources; 39 percent from energy consumption; 43 percent from mobile sources; less than 1 percent from stationary sources; 3 percent from solid waste generation; 6 percent from water supply, treatment, and distribution; and 8 percent from construction activities. Provided in Table IV.E-5 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR is an evaluation of applicable reduction actions/strategies outlined in the Climate Change Scoping Plan that through implementation would serve to indirectly reduce Project GHG emissions.⁵⁸ Further evaluation of project design features and specific applicable policies and measures in the Climate Change Scoping Plan is provided in Table IV.E-6 in Section IV.E, Greenhouse Gas

⁵⁸ CARB, 2014 Update, May 2014, p. 4.

Emissions, of this Draft EIR. As detailed therein, the Project would not conflict with the Climate Change Scoping Plan which is intended to reduce GHG emissions.

Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

As such, the Project would not conflict with the GHG reduction-related actions and strategies in the 2008 Climate Change Scoping Plan and subsequent updates, and impacts would be less than significant.

(ii) 2016–2040 RTP/SCS

The purpose of SB 375 is to implement the State’s GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel. Under SB 375, the primary goal of the 2016–2040 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning and transportation options. To accomplish this goal, the 2016–2040 RTP/SCS identifies various strategies to reduce per capita VMT.

The 2016–2040 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita transportation emissions of 9 percent passenger vehicle GHG emissions by 2020 and 16 percent passenger vehicle GHG emissions by 2035.⁵⁹ In March 2018, the CARB updated the SB 375 targets to require a per capita passenger vehicle emissions reduction of 8-percent reduction by 2020 and a 19-percent decrease in VMT for the SCAG region by 2035 compared to baseline (2005) GHG emissions.⁶⁰ As these reduction targets were updated after the 2016–2040 RTP/SCS, it is expected that the next iteration of the RTP/SCS will be updated to include these targets. The 2016–2040 RTP/SCS and/or the next RTP/SCS are expected to fulfill and exceed SB 375 compliance with respect to meeting the State’s GHG emission reduction goals.

In addition to demonstrating the region’s ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2016–2040 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and

⁵⁹ CARB, *Regional Greenhouse Gas Emission Reduction Targets Pursuant to SB 375, Resolution 10-31*.

⁶⁰ CARB, *SB 375 Regional Greenhouse Gas Emissions Reduction Targets (2018)*.

transportation demands. Thus, successful implementation of the 2016–2040 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, the strategies and policies set forth in the 2016–2040 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency. These strategies and policies are addressed below.

(1) Consistency with Integrated Growth Forecast

The 2016–2040 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG’s Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. According to the 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2016 was 3,945,849 persons. In 2023, the projected occupancy year of the Project, the City of Los Angeles Subregion is anticipated to have a population of 4,145,604 persons. Based on a household size factor of 2.42 persons per household for multi-family housing units, the Project is estimated to generate a residential population of 630 persons at full buildout.⁶¹ The estimated 630 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. 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. 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.⁶² In 2023, the City of Los Angeles Subregion is anticipated to have 1,834,339 employees.⁶³ Thus, the Project’s 52 estimated employees would constitute approximately 0.05 percent of the employment growth forecasted between 2016 and 2023. Because similar projections form the basis of the 2016 AQMP, it can be concluded that the Project would be consistent with the projections in the AQMP. Please refer to Section IV.F, Land Use, of this Draft EIR, for additional information regarding consistency with the 2016–2040 RTP/SCS, as well as the Project’s Initial Study included as Appendix A of this Draft EIR, for information regarding Project consistency with SCAG’s growth projections.

⁶¹ *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.*

⁶² *Based on a linear interpolation of 2012–2040 data.*

⁶³ *Based on a linear interpolation of 2012–2040 data.*

(2) Consistency with VMT Reduction Strategies and Policies

The 2016–2040 RTP/SCS includes, for the SCAG region as a whole, a daily 22.8 Total VMT per capita for the 2012 Base Year, and a daily 20.5 Total VMT per capita for the 2040 Plan Year. For Los Angeles County, the 2012 Base Year projected daily Total VMT per capita is 21.5 and 18.4 daily Total VMT per capita for the 2040 Plan Year. To analyze the Project's consistency with this aspect of the 2016–2040 RTP/SCS, the Project's Total Daily VMT was divided by the Project's service population to arrive at the per capita Total Daily VMT estimates. The estimate, as provided in Table IV.E-7 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, was compared to the VMT data for the region and Los Angeles County provided by the 2016 RTP/SCS; in both instances, the Project's per capita Total VMT estimate was lower.

The Project would be designed and constructed to incorporate features to support and promote environmental sustainability. As discussed above, the Project represents an infill development within an existing urbanized area that would introduce new uses on the Project Site, including new residential, retail, office, and restaurant uses within an HQTAs. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation. The Project Site is also located approximately 0.25 mile from the Hollywood/Vine Metro Red Line station and is served by eight Metro local bus lines and three DASH bus lines, and one LADOT Commuter Express bus line. The Project would also provide required short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC. The increase in transit accessibility and the bicycle parking spaces provided on-site would further reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation.

As shown in Appendix C of this Draft EIR, the Project design includes characteristics that would reduce trips and VMT as compared to a standard project within the air basin as measured by CalEEMod. These relative reductions in vehicle trips and VMT from a standard project within the air basin help quantify the GHG emissions reductions achieved by locating the Project in an infill, HQTAs area that promotes alternative modes of transportation. Specifically, the Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which identifies the VMT and vehicle trips reductions for the Project Site relative to the standard trip and VMT rates in CalEEMod, which corresponds to reduction relative to GHG emissions. Measures applicable to the Project include the following; a brief description of the Project's relevance to the measure is also provided below. Detailed calculations are presented in Appendix C of this Draft EIR.

CAPCOA Measure LUT-1—Increase Density: Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with

transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The Project would increase the site density from 0 dwelling units per acre to 186 dwelling units per acre. Job density would decrease from 56 jobs per acre to 40 jobs per acre.

CAPCOA Measure LUT-3—Increase Diversity of Urban and Suburban Developments (Mixed-Uses): The Project would introduce new uses on the Project Site, including new residential, retail, and office uses. The Project would locate complementary new residential, retail and office uses in proximity to other existing off-site residential, office, retail, restaurant, and hotel uses. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation (i.e., walking and biking), which would result in corresponding reductions in transportation-related emissions.

CAPCOA Measure LUT-5—Increase Transit Accessibility: The Project Site will be located approximately 0.25 mile from the Metro Red Line Hollywood/Vine Station as well as 12 bus lines on Hollywood Boulevard that would encourage and support use of public transportation. The Project would also provide bicycle parking spaces for the proposed uses to encourage utilization of alternative modes of transportation.

CAPCOA Measure LUT-9—Improve Design of Development: The Project would add community-serving retail and restaurant along Hollywood Boulevard. Additional retail and restaurant uses as well as residential amenities including a lobby area and lounge would be located along Wilcox Avenue. An outdoor courtyard, which could be used as an outdoor seating/dining area for a restaurant, would also be incorporated to the north of the commercial use at ground-level along Wilcox Avenue and would be publicly accessible during business hours. The Project would include a high level of street access, which improves street accessibility and connectivity.

CAPCOA Measure SDT-1—Provide Pedestrian Network Improvements: Project design would provide pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets to encourage people to walk instead of drive. The Project would provide several improvements, such as direct access to the existing off-site pedestrian network including existing off-site sidewalks along Hollywood Boulevard and Wilcox Avenue, to encourage and increase pedestrian activities in the area, which would further reduce VMT and associated transportation-related emissions.

CAPCOA Measure SDT-2—Traffic Calming Measures: The Project would be located in an area with traffic calming measures to encourage people to walk or bike instead of using a vehicle. This mode shift results in a decrease in VMT. Streets within 0.5 mile of the Project Site are equipped with sidewalks.

As shown in Table IV.E-7 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project's daily 9.5 Total Project VMT per capita would be well below the SCAG region's daily 20.5 Total VMT per capita for the 2040 Plan Year and Los Angeles County's 18.4 daily Total VMT per capita for the 2040 Plan Year. In addition, the Project would result in a VMT reduction of approximately 67 percent in comparison to a Project without Reduction Features as estimated by CalEEMod and a 75-percent reduction in GHG emissions from mobile sources, which would be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS. This reduction is attributable to the Project characteristics of being an infill development near transit that supports multi-modal transportation options.

The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2016–2040 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Jobs and housing closer to transit;
- New housing and job growth focused in HQTAs; and
- Biking and walking infrastructure to improve active transportation options and transit access.

The Project represents an infill development within an existing urbanized area that would concentrate new residential, office, and commercial retail uses within an HQTA, which is defined by the 2016–2040 RTP/SCS as a generally walkable transit village or corridor that is within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours (see Section IV.D, Land Use, of this Draft EIR for further discussion). The Project Site is located approximately 0.25 mile from the Hollywood/Vine Metro Red Line station and is served by eight Metro local bus lines, three DASH bus lines, and one LADOT Commuter Express bus line. The Project would provide 35 short-term and 269 long-term bicycle parking spaces to further encourage biking. The Project would also enhance pedestrian activity along Hollywood Boulevard and Wilcox Avenue through building design and proposed streetscape amenities by providing ground-level community-serving retail and restaurant use. Streetscape amenities provided by the Project would include a row of street trees on Wilcox Avenue, pedestrian-scale lighting fixtures and elements, and landscaped outdoor seating areas. The Project would also widen the sidewalk by five feet along a portion of Wilcox Avenue, increase transparency along Wilcox Avenue by locating the residential lobby and amenities there, and locating vehicular loading and drop-off within the parking structure, out of sight

of the sidewalk. Furthermore, the Project Site was designed to encourage walkability through a mix of uses. These and other measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2016–2040 RTP/SCS.

(3) Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2016–2040 RTP/SCS, with regard to individual development projects such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. This 2016–2040 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. The Project would provide at least 20 percent of the total Code-required parking spaces provided to be capable of supporting future EVSE and will further improve at least 10 percent of the total Code-required parking spaces with EV charging stations as dictated by GHG-PDF-2.

(4) Energy Efficiency Strategies and Policies

The third important focus within the 2016–2040 RTP/SCS, for individual developments such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2016–2040 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. As discussed above, GHG-PDF-1 would require the design of the building to incorporate a number of sustainability features consistent with the Project's certification under AB 900, including optimizing energy performance and reduce building energy cost by 22 percent for new/remodeled construction compared to the LEED® baseline of ASHRAE 90.1-2010, installation of efficient HVAC mechanical systems, use of LED lighting or other energy-efficient lighting technologies, etc., thus reducing overall energy usage compared to baseline conditions. In total, Project GHG emissions from electricity and natural gas usage would be reduced by at least 14 percent with implementation of the Project design features. Accordingly, the Project would be consistent with the 2016–2040 RTP/SCS energy efficiency strategies and policies.

(5) Land Use Assumptions

At the regional level, the 2016–2040 RTP/SCS is an applicable plan adopted for the purpose of reducing GHGs. In order to assess the Project's potential to conflict with the 2016–2040 RTP/SCS, this Draft EIR also analyzes the Project's land use assumptions for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project's consistency with the applicable goals and principles set forth in the 2016–2040

RTP/SCS is analyzed in Table 5 in Appendix H, Land Use Tables, of this Draft EIR. As shown therein the Project would be consistent with the goals and principles set forth in the 2016–2040 RTP/SCS.

In sum, the Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State’s long-term climate policies. By furthering implementation of SB 375, the Project would support regional land use and transportation GHG reductions consistent with state regulatory requirements.

Overall, the Project would not conflict with the GHG reduction-related actions and strategies contained in the 2016 RTP/SCS. As such, impacts related to consistency with the 2016 RTP/SCS would be less than significant.

(iii) AB 900

AB 900 establishes procedures for applying for streamlined environmental review under CEQA for Projects that meet certain requirements. With respect to GHG emissions, a project must demonstrate that it would not result in any net additional GHGs, including GHG emissions from employee transportation in accordance with PRC Section 21183(c). The Project was certified under AB 900 (refer to Appendix B of this Draft EIR). As determined therein, the Project would not result in any net additional GHGs, including GHG emissions from employee transportation in accordance with PRC Section 21183(c) with the purchase of emission offset credits. Therefore, the Project would meet the GHG emissions requirements for streamlined environmental review under CEQA.

(iv) City of Los Angeles Sustainable City pLAN/L.A.’s Green New Deal

The Sustainable City pLAN/L.A.’s Green New Deal includes both short-term and long-term aspirations through the year 2050 in various topic areas, including: water, renewable energy, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.

The Sustainable City pLAN/L.A.’s Green New Deal provides information as to what the City will do with buildings and infrastructure in their control, and provides specific targets related to housing and development as well as mobility and transit, including the reduction of vehicle miles traveled per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. As noted above, the Sustainable City pLAN was updated in April 2019 and renamed as L.A.’s Green New Deal which has established targets such as 100 percent renewable energy by 2045, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035.

Table IV.E-8 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, provides a discussion of the Project's consistency with applicable GHG-reducing actions from the City of LA's Green New Deal. As discussed therein, the Project would be consistent with the applicable goals and actions of the City of LA Green New Deal.

Although the Sustainable City pLAN/L.A.'s Green New Deal is not directly applicable to private development projects, the Project would generally be consistent with these targets as it is an infill development consisting of residential, retail, office, and restaurant uses on a Project Site located approximately 0.25 mile from the Hollywood/Vine Metro Red Line station and is served by eight Metro local bus lines and three DASH bus lines, and one LADOT Commuter Express bus line. Furthermore, the Project would comply with CALGreen, implement various project design features that would reduce energy usage, including GHG-PDF-1 through GHG-PDF-4 and WAT-PDF-1, and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAN/L.A.'s Green New Deal with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for Project residents and guests.

Overall, the Project would not conflict with the Sustainable City pLAN/L.A.'s Green New Deal. Therefore, impacts would be less than significant.

(v) Post-2030 Analysis

Recent studies show that the State's existing and proposed regulatory framework will put the State on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.⁶⁴ Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the Statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies

⁶⁴ *Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.*

and other regulations not analyzed in the studies could allow the State to meet the 2050 target.

Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which would require Statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030 and includes various strategies to meet that goal. The Project's design features advance these goals by reducing VMT, increasing the use of electric vehicles, improving energy efficiency, and reducing water usage.

The emissions modeling in the 2017 Update has projected 2030 statewide emissions which take into account known commitments (reduction measures) such as SB 375, SB 350, and other measures. The emissions inventory identified an emissions gap, meaning that emissions reductions due to known commitments do not decline fast enough to achieve the 2030 target. In order to fill this gap, the 2017 Update assumed a scenario in which cap-and-trade would deliver the reductions necessary to achieve the 2030 emissions target. Although the Project is consistent with the 2017 Update, additional measures to achieve the 2030 targets and beyond are outside of the City or the Project's control. Therefore, any evaluation of post-2030 Project emission would be speculative.

Executive Order S-3-05 establishes a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. This goal, however, has not been codified. That being said, studies have shown that, in order to meet the 2050 target, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its *2008 Climate Change Scoping Plan*, CARB acknowledged that the "measures needed to meet the 2050 are too far in the future to define in detail."⁶⁵

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's net emissions level (1,042 metric tons of CO₂e per year) to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's total emissions at build-out presented in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with the Executive Order's horizon-year (2050) goal. Further, the Project's consistency with SCAG's 2016–2040

⁶⁵ CARB, *Climate Change Scoping Plan: A Framework for Change*, December 2008, p. 117.

RTP/SCS demonstrates that the Project will be consistent with post-2020 GHG reduction goals.

The Project is the type of land use development that is encouraged by the 2016–2040 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State’s long-term climate policies. As shown in Table IV.E-7 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project’s daily 9.5 Total Project VMT per capita is below the overall SCAG region’s daily 20.5 Total VMT per capita for the 2040 Plan Year and Los Angeles County’s daily 18.4 Total VMT per capita for the 2040 Plan Year. In addition, the Project results in a VMT reduction of 67 percent and related mobile source GHG emissions reduction of approximately 75 percent in comparison to a Project without Reduction Features as estimated by CalEEMod, as shown in Appendix C of this Draft EIR, and would be consistent with the reduction in transportation emissions per capita provided in the 2016 RTP/SCS and the updated SB 375 targets. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State climate targets for 2020 and beyond.

For the reasons described above, the Project’s post-2030 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Orders S-3-05 and B-30-15.

(vi) Conclusion

The Project does not conflict with the plans, policies, regulations, and GHG reduction actions/strategies outlined in applicable GHG reduction plans and policies. Therefore, impacts related to regulatory consistency would be less than significant.

(b) Project Emissions

CEQA Guidelines Section 15064.4 recommends quantification of a Project’s GHG emissions. However, the quantification is being done for informational purposes only and Project GHG emissions are not evaluated against any numeric threshold, as compliance with a GHG emissions reduction plan renders a project’s potential impacts less than significant. In support of the above regulatory consistency analysis which describes the Project’s compliance with or exceedance of performance-based standards included in the regulations and policies outlined in the applicable portions of the 2008 Climate Change Scoping Plan and subsequent updates, the 2016–2040 RTP/SCS, AB 900, and the Sustainable City pLAn/L.A.’s Green New Deal, quantitative calculations are provided below.

The Project would result in direct and indirect GHG emissions generated by different types of emissions sources, including:

- Construction: emissions associated with demolition of the existing parking lot, shoring, excavation, grading, and construction-related equipment and vehicular activity;
- Area source: emissions associated with landscaping equipment and consumer products;
- Energy source (building operations): emissions associated with space heating and cooling, water heating, energy consumption, and lighting;
- Mobile source: emissions associated with vehicles accessing the project site;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.

The Project would generate an incremental contribution and cumulatively increase GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

(i) Construction

As described in Section II, Project Description, of this Draft EIR, Project construction is estimated to take approximately 24 months with an anticipated completion date of 2023. Construction assumptions used in the analysis of GHG emissions conservatively assumes that the Project would be constructed in the shortest duration possible with the most intensive activities occurring on a daily basis. Earthwork on the Project Site would require approximately 58,000 cubic yards of grading, all of which would be exported. CalEEMod outputs containing additional construction details are provided in Appendix C. The GHG emissions associated with Project construction were calculated for each year of construction activity, as summarized in Table IV.E-9 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR.

As presented in Table IV.E-9 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, Project construction is estimated to generate a total of 2,638 MTCO_{2e}. As

recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory, resulting in annual amortized emissions of 88 MTCO_{2e}.⁶⁶

(ii) *Operation*

(1) Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes the use of landscape maintenance equipment, consumer products, and natural gas fireplaces. As shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project, at full buildout, is expected to result in a total of 4 MTCO_{2e} per year from area sources and accounts for a 95 percent reduction in area source emissions with implementation of GHG-PDF-4 as compared to the Project without Reduction Features.

(2) Electricity and Natural Gas Generation Emissions

Electricity and natural gas emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for LADWP were selected in CalEEMod. The carbon intensity (lb/MWh) for electricity generation was calculated for the Project buildout year based on LADWP projections; as LADWP projections are not calculated for every year, straight line interpolation was performed to estimate the LADWP carbon intensity factor for the Project buildout year based on Year 2015 and 2026 data.⁶⁷ LADWP's carbon intensity projections also take into account SB 350 RPS requirements for renewable energy. However, they conservatively do not account for SB 100 RPS requirements for renewable energy. Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., the heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

⁶⁶ SCAQMD Governing Board Agenda Item 31, December 5, 2008.

⁶⁷ LADWP, 2016 Power Integrated Resource Plan.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and California Residential Appliance Saturation Survey (RASS) studies.⁶⁸ The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the ZIP Code tool.⁶⁹ Since these studies are based on older buildings, CalEEMod provides adjustments to account for more stringent requirements under 2016 Title 24 building codes. Subsequent to release of the most current version of CalEEMod (Version 2016.3.2), the 2019 Title 24 standards went into effect January 1, 2020. Thus, the Draft EIR analysis conservatively does not include additional reductions in building energy consumption related to applicable 2019 Title 24 standards.

In addition, as previously discussed, the Project would implement a number of Project Design Features that would reduce energy consumption. Specifically, GHG-PDF-1 would require the Project to optimize energy performance and reduce building energy cost by 22 percent for new/remodeled construction compared to the LEED® baseline of ASHRAE 90.1-2010. This analysis conservatively assumes no reduction in GHG emissions in comparison to 2016 Title 24 Building Standards Code provided in CalEEMod default energy consumption rates. GHG-PDF-3 would require the Project to provide a minimum of 105 kilowatts of photovoltaic panels on the Project Site.

As shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, Project GHG emissions from electricity and natural gas usage would result in a total net increase of 403 MTCO₂e per year, and accounts for implementation of GHG-PDF-1 and GHG-PDF-3. GHG emissions presented in Table IV.E-10 also takes into account energy usage related to the Attie Building which will be retained as part of the Project. The Attie Building would be rehabilitated with energy efficient materials and design which will reduce overall energy usage compared to the existing use. Per California Building Code Section 3404A.1, alterations to any building or structure shall comply with the requirements of the code for new construction. Therefore, the applicable provisions of Title 24 and the Los Angeles Green Building Code discussed above and in the analysis below apply to the rehabilitation of this historic structure.

(3) Mobile Source Emissions

Mobile source operational GHG emissions were calculated using SCAQMD-recommended CalEEMod based on the Project trip-generation estimates provided in the

⁶⁸ CEC, *Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.*

⁶⁹ *California Air Pollution Control Officers Association, California Emissions Estimator Model, User's Guide, Appendix F.*

Traffic Study, included as Appendix O.1 of this Draft EIR.⁷⁰ As discussed in Section IV.I, Transportation, of this Draft EIR, to calculate peak hour trip estimates, the number of residential units and the amount of office and commercial retail floor area were multiplied by the applicable trip-generation rates based on the Institute of Transportation Engineers (ITE)'s *Trip Generation, 9th Edition*. CalEEMod calculates the VMT generated by on-road mobile daily trips associated with residents, employees, visitors, and delivery vehicles visiting the Project Site. The VMT was multiplied by emission factors provided in EMFAC 2017 to calculate the total mobile source emissions.

The Project design also includes characteristics that would reduce trips and VMT as compared to a standard project within the air basin as measured by CalEEMod. The Project Site is located approximately 0.25 mile from the Hollywood/Vine Metro Red Line station and is served by eight Metro local bus lines and three DASH bus lines, and one LADOT Commuter Express bus line. The location of mass-transit in close proximity to the Project site would encourage alternative modes of transportation, resulting in VMT reductions.⁷¹ The Project would provide 35 short-term and 269 long-term bicycle parking spaces to further encourage biking. The Project would locate residential uses in proximity to a job center which would reduce the distance required for travel from home to work.

As shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, Project GHG emissions from mobile sources would result in a total net increase of 444 MTCO_{2e} per year, which accounts for a 75-percent reduction in mobile source emissions as compared to the Project without Reduction Features, when taking into account the distance to job centers and mass transit. Project-related mobile source emissions also take into account GHG-PDF-2 which would provide for electric vehicle charging infrastructure on-site.

(4) Stationary Source Emissions

Emissions related to stationary sources were calculated using the CalEEMod emissions inventory model. It is anticipated the Project would include an emergency generator on-site. As shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, the Project scenario is expected to result in a total of 2 MTCO_{2e} per year from stationary sources.

⁷⁰ Gibson Transportation Consulting, *Transportation Impact Study for the Hollywood and Wilcox Project, Hollywood, California, June 2018; refer to Appendix O.1 of this Draft EIR.*

⁷¹ CAPCOA, *Quantifying Greenhouse Gas Mitigation Measures, 2010.*

(5) Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, Project GHG emissions from solid waste generation would result in a total net increase of 36 MTCO_{2e} per year which takes into account a 50-percent recycling/diversion rate.

(6) Water Usage and Wastewater Generation Emissions

Emissions related to water usage and wastewater generation were calculated using the CalEEMod emissions inventory model, as described above in the methodology section.

As shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, Project GHG emissions from water/wastewater usage would result in a total net increase of 65 MTCO_{2e} per year, which accounts for a 34-percent reduction in water/wastewater emissions with implementation of WAT-PDF-1 provided in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR.

(iii) Combined Construction and Operational Impacts

As shown in Table IV.E-10 in Section IV.E, Greenhouse Gas Emissions, of this Draft EIR, when taking into consideration implementation of relevant Project design features, as well as the requirements set forth in the City of Los Angeles Green Building Code and full implementation of current state mandates, the Project's GHG emissions in 2023 would be 88 MTCO_{2e} per year (amortized over 30 years) during construction and 954 MTCO_{2e} per year during operation, for a combined total of 1,042 MTCO_{2e} per year. As discussed previously, GHG emissions presented in Table IV.E-10 also takes into account operations related to the Attie Building which will be retained as part of the Project.

(c) Conclusion

In summary, the Project's location, land use characteristics, and design render it consistent with statewide and regional climate change mandates, plans, policies, and recommendations. More specifically, the plan consistency analysis provided above demonstrates that the Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the 2008 Climate Change Scoping Plan and subsequent updates, the 2016–2040 RTP/SCS, AB 900, and the Sustainable City pLAN/L.A.'s Green New Deal. As the Project would not conflict with relevant plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs,

impacts related to regulatory consistency would be less than significant. **Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.**

(5) Land Use

(a) Physically Divide a Community

The Project is a mixed-use development that would provide new residential and community-serving retail, office, and restaurant uses that would be compatible with and would complement existing and future development within the Project area. Implementation of the Project would result in further infill of an already developed community with similar and compatible land uses. There is no existing residential use on the Project Site or a residential area that would be physically separated or otherwise disrupted by the Project, as development of the Project would occur within the boundaries of the Project Site as it currently exists.

In summary, the Project would be contained within the Project Site and would be compatible with surrounding development. Thus, the Project would not physically divide, disrupt, or isolate an established community, and Project impacts would be less than significant.

(b) Conflict with any land use plan, policy, or regulation

(i) Local Plans and Applicable Policies

Various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the applicable goals, objectives, and policies of the General Plan, including the Framework Element, the Mobility Plan, Conservation Element, and the Housing Element; Community Plan; the Citywide Design Guidelines; and the Walkability Checklist.

(1) Los Angeles General Plan

(a) City of Los Angeles General Plan Framework Element

The Project's general consistency with the applicable objectives and policies that support the goals set forth in the Framework Element is discussed in detail in Table 1 of

Appendix H of this Draft EIR. Provided below is a general discussion of whether the Project would conflict with any applicable goals, objectives, and policies of the General Plan adopted for the purpose of avoiding or mitigating an environmental effect.

(i) Land Use Chapter

The Framework Element Land Use Diagrams designate districts, centers and mixed-use boulevards. The Project Site is located in an area that is identified as a Regional Center on the Framework Element's Long Range Land Use Diagram for the City's Metro area. The Project would support and would be consistent with the Framework Element Land Use Chapter as it would contribute to the needs of the City's existing and future residents, businesses, and visitors by providing 260 multi-family residential units, up to 10 percent of which would be workforce housing, and approximately 17,800 square feet of community-serving retail, restaurant, and office uses. In addition, development of the Project in an area with convenient access to public transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled (VMT), and air pollution, while supporting the City's objective to encourage new multi-family residential, retail, restaurant, and office uses along primary transit corridors/boulevards and in designated Regional Centers.

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. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Land Use Chapter.

(ii) Housing Chapter

The Project would support the City's objective to plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types, through the development of 260 new multi-family residential units, consisting of 20 studios, 140 one-bedroom units, 87 two-bedroom units, and 13 three-bedroom units. Of the 260 residential units, up to 10 percent would be designated as workforce housing. In addition, the Project would encourage the location of new multi-family housing to occur in proximity to transit by locating the Project in an area well-served by public transit, including bus stops along Hollywood Boulevard and the Metro Red Line Hollywood/Vine Station located approximately 0.25 mile east of the Project Site. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Housing Chapter.

(iii) Open Space and Conservation Chapter

The Project would include a variety of open space and recreational amenities for residents and visitors. On the ground floor, the Project would provide a landscaped and

seating area for patrons of the proposed restaurant use located south of the Attie Building. The residential recreational amenities would be provided on Levels 1, 2, 4, and 12. The Project's outdoor residential amenities would include a dog run, pool, spa, lounge seating, barbecue area, chaise lounge, cabanas, fitness and yoga area, fire pit, fireplace, and a variety of landscaped seating areas. The Project's indoor residential amenities would include a theater, music room and library, yoga studio, fitness room, and lounge. In addition, the Project would provide 3,500 square feet of outdoor private open space. In total, the Project would provide approximately 33,750 square feet of open space, which would exceed the 29,150 square feet required by the LAMC. Furthermore, the Project would incorporate elements that promote individual and community safety throughout the Project Site, including open space areas that are well-lit and equipped with a closed-circuit camera system to allow for constant monitoring of such areas to ensure public safety and security at all times. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Open Space and Conservation Chapter.

(iv) Economic Development Chapter

The Project would support the City's objective to establish a balance of land uses through the development of a mixed-use project with residential and retail, restaurant, and office uses in an area well-served by public transit. The proposed community-serving retail, restaurant, office uses would complement the employment base (e.g., existing residential, commercial, office, hotels, and entertainment venues) of the Hollywood Community Plan area, provide amenities to meet the needs of local residents, and serve to reduce VMT by locating housing and jobs in an area well served by public transit. Thus, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Economic Development Chapter.

(v) Infrastructure and Public Services Chapter

The Project would support the City's policy and objectives pertaining to effective and efficient approaches to protecting water quality by implementing a SWPPP during construction that would include BMPs and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. During operation, the Project would include BMPs to collect, detain, treat, and discharge runoff on-site before discharging into the municipal storm drain system as part of the SUSMP. Implementation of Project BMPs would minimize the discharge of pollutants from the Project Site. Furthermore, as discussed in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. In addition, as discussed in Section IV.K.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project would not exceed wastewater treatment requirements of the LARWQCB, and LASAN is anticipated to make a determination that it has adequate

treatment capacity to serve the Project's projected demand in addition to existing commitments. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Framework Element's Infrastructure and Public Services Chapter.

(vi) Conclusion

Based on the analysis above, the Project would not conflict with the relevant goals, objectives, and policies of the Framework Element.

(b) Mobility Plan 2035

The Project's general consistency with the applicable goals, objectives, and policies set forth in the Mobility Plan adopted for the purpose of avoiding or mitigating an environmental effect is discussed in Table 2 of Appendix H of this Draft EIR.

Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Traffic Management Plan that would incorporate safety measures around the construction site to reduce the risk to pedestrian activity near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce congestion to public streets and highways. The Project would ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

During operation, the Project would recognize all modes of travel by providing adequate vehicular and pedestrian access and providing bicycle facilities. Specifically, the Project would include 304 bicycle parking spaces on Level 1 and widen the sidewalk by five feet along a portion of Wilcox Avenue. The Project would also enhance pedestrian activity along Hollywood Boulevard and Wilcox Avenue through building design and proposed streetscape amenities by providing ground-level, community-serving retail and restaurant use. Streetscape amenities provided by the Project would include a row of street trees on Wilcox Avenue, pedestrian-scale lighting fixtures and elements, and landscaped outdoor seating areas. Additionally, given the location of the Project Site along and in proximity to major transit corridors, the Project would provide all residents, guests, employees, and patrons of the on-site uses convenient access to transit services. The Project would also include a Transportation Demand Management (TDM) Program pursuant to Project Design Feature TR-PDF-2 to reduce peak-hour vehicular traffic to and from the Project Site by 15 percent. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Mobility Plan.

(c) Los Angeles General Plan Conservation Element

As identified in Subsection 2.a.(1)(a)(ii), the Conservation Element primarily address the preservation, conservation, protection, and enhancement of the City's natural resources. The Project's consistency with this objective and this policy is analyzed below.

As discussed in the Initial Study included in Appendix A of this Draft EIR, the Project Site is currently developed with four low-rise commercial buildings and surface parking lot and does not contain any natural resources. Landscaping within the Project Site is limited. Two ornamental trees are located along Hollywood Boulevard and two ornamental trees are located within the surface parking lot. These existing trees consist of various non-native species that are not subject to the City of Los Angeles Protected Tree Relocation and Replacement Ordinance (Ordinance No. 177,404).⁷² As discussed in the Initial Study included as Appendix A of this Draft EIR, due to the improved nature of the Project Site and the surrounding areas, and lack of large expanses of open space areas, species likely to occur on-site are limited to small terrestrial and avian species typically found in developed settings. Therefore, 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 or U.S. Fish and Wildlife Service. No riparian or other sensitive natural community exists on the Project Site or in the immediate surrounding area. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site or in the immediate vicinity of the Project Site. The areas surrounding the Project Site are fully developed and there are no large expanses of open space areas within and surrounding the Project Site which provide linkages to natural open spaces areas and which may serve as wildlife corridors. Accordingly, development of the Project would not interfere substantially with any established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Furthermore, no water bodies that could serve as habitat for fish exist on the Project Site or in the vicinity of the Project Site.

Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Conservation Element.

⁷² *The City of Los Angeles Protected Tree Relocation and Replacement Ordinance (Ordinance No. 177,404) protects Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species that are native to Southern California, and excludes trees grown by a nursery or trees planted or grown as part of a tree planting program.*

(d) Los Angeles General Plan Housing Element

The Project's consistency with the applicable policies set forth in the Housing Element of the General Plan is discussed in detail in Table 3 of Appendix H of this Draft EIR.

The Project would provide a variety of housing types (i.e., studio, one-, two-, and three-bedroom units) in an area that is pedestrian-friendly and served by public transit. Specifically, the Project would develop 260 new multi-family residential units, consisting of 20 studios, 140 one-bedroom units, 87 two-bedroom units, and 13 three-bedroom units. Of the 260 residential units, up to 10 percent would be designated as workforce housing. In addition, the Project would encourage the location of new multi-family housing to occur in proximity to transit by locating the Project in a designated HQTAs and TPAs, with transit options including bus stops along Hollywood Boulevard and the Metro Red Line Hollywood/Vine Station located approximately 0.25 mile east of the Project Site. The Project would also promote the construction of green buildings by incorporating sustainable design features, including energy conservation, water conservation, alternative transportation programs, a pedestrian- and bicycle-friendly site design, and waste reduction measures. Therefore, the Project would not conflict with the applicable goals, objectives, and policies set forth in the Housing Element.

(e) Hollywood Community Plan

The Project's general consistency with the objectives and policies set forth in the Community Plan is discussed in detail in Table 4 of Appendix H of this Draft EIR.

The Project would be generally consistent with the objectives and policies that support the goals of the Community Plan. The Project would support the City's objectives and policies to coordinate the development of the Hollywood area with that of other parts of the City of Los Angeles and the metropolitan area. The Project would introduce 260 residential units (consisting of studio, one-, two-, and three-bedroom units), up to 10 percent of which would be workforce housing, that would provide needed housing in the Hollywood Community Plan area. The Project would make provisions for the housing required to satisfy the varying needs and desires of all economic segments of the Community Plan area by developing new residential and community-serving retail, restaurant, and office uses in Hollywood. The proposed uses would be located in a designated HQTAs and TPAs, which would reduce VMT.

Furthermore, the Project would provide a variety of open space areas within the Project Site, including recreational amenities for residents and a ground floor courtyard and landscaped seating area for patrons of the commercial use proposed by the Project. The residential recreational amenities would be provided on Levels 1, 2, 4, and 12. Level 1 will

include a lounge, internet café, and an outdoor courtyard on the south side of the building for resident use. On Level 2, the Project would include an indoor theater and an outdoor dog run deck with seating areas. On Level 4, the Project would include a pool deck featuring a swimming pool and spa, a fire pit, a barbecue area, a chaise lounge, and cabanas, and a courtyard would provide an outdoor yoga and fitness area and additional seating areas. An indoor music room and library would also be featured on Level 4. On Level 12, a sky deck would provide a fireplace, barbecue counters, and landscaped family-style seating areas. In total, the Project would provide approximately 33,750 square feet of open space, which would exceed the 29,150 square feet required by LAMC.

The Project would include street improvements to comply with the requirements of the Mobility Plan. Accordingly, the Project would provide opportunities to improve Hollywood's pedestrian environment, recognizing the various alternative modes of transportation available in the immediate vicinity of the Project Site.

Therefore, the Project would not conflict with the goals, objectives, and policies set forth in the Community Plan.

(2) Citywide Design Guidelines

The Citywide Design Guidelines are intended as performance goals and not zoning regulations or development standards. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. As detailed below, the Project would not conflict with the applicable Citywide Design Guidelines.

Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.

The Project would enhance the streetscape adjacent to the Project Site along Hollywood Boulevard and Wilcox Avenue by implementing a variety of measures that would encourage pedestrian activity and activate the public realm. The Project would retain two street trees along Hollywood Boulevard and provide a new row of street trees along Wilcox Avenue. In addition, the Project would include low-level exterior lights adjacent to the buildings and along pathways that would serve to enhance the safety of pedestrians at night. The Project would also include pedestrian-accessible, ground floor commercial uses that would be designed with articulation and window treatments that would enhance the streetscape. Lastly, the Project would repair and improve the sidewalks along the Project frontage, including widening a portion of the sidewalk along Wilcox Avenue. These Project elements would provide additional pedestrian amenities for the community and provide a safe, comfortable, and accessible pedestrian experience for all.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.

The Project would include the removal of surface parking within the Project Site. All Project parking would be located within two levels of subterranean, one level of at-grade, and two levels of above-grade parking. Driveways and parking areas would be unobtrusive as the only curb cut is a single two-lane driveway on Wilcox Avenue that provides access to resident drop-off, loading, trash areas, and structured parking for residents and commercial patrons. The parking areas on Levels 1 and 2 would be hidden from view on Wilcox Avenue by the double-height ground floor commercial space, residential lobby, and amenity areas. Similarly, on Level 3, the apartments lining the elevation along Wilcox Avenue would hide the above grade parking from the street. Thus, the parking garage and driveways would not be highly visible from surrounding areas, which would serve to enhance the pedestrian environment.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

The Project would retain two street trees along Hollywood Boulevard and provide a new row of street trees along Wilcox Avenue. The retained and proposed trees along Hollywood Boulevard and Wilcox Avenue would also provide shading to users of the sidewalks. As such, the Project would provide a balance between landscaping and paved areas used by the public, as well as Project residents and patrons of the retail and restaurant uses located on the ground floor of the Project. In addition, the courtyard south of the Attie Building, which could be used as outdoor seating for the proposed restaurant use, would be publicly accessible but would also create a sense of enclosure and safety. Furthermore, the retail and restaurant uses would be designed with glass windows, evoking a sense of connection between the visible interior and the open space where people may sit, eat, or socialize.

Guideline 8: Protect the site's natural resources and features.

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, the Project Site is located in an urbanized area and is currently developed with four low-rise commercial buildings and associated surface parking. Landscaping within the Project Site is limited, with ornamental trees located along Hollywood Boulevard and two trees within the surface parking lot which would be removed during construction. None of the trees are protected by the City's Protected Tree Relocation and Replacement Ordinance trees would be replaced on-site pursuant to City requirements.

Guideline 9: Configure the site layout, building massing, and orientation to lower energy demand and increase the comfort and well being of users.

As discussed in Section II, Project Description, of this Draft EIR, the Project's design would incorporate energy-efficient design methods and technologies, such as high performance window glazing; passive energy efficiency strategies, such as façade shading, roof overhangs, porches, and inner courtyards; high efficiency domestic heaters; and enhanced insulation to minimize solar heat gain. The Project would also include operable windows, shading of unit fenestration through balcony overhangs to prevent excess heat, use of natural light and installation of photovoltaic panels.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.

As discussed in the Project's Initial Study included as Appendix A of this Draft EIR, the Project would manage stormwater through a capture and reuse system. 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.

(3) City of Los Angeles Walkability Checklist

The Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form. As stated within the Walkability Checklist, while each of the implementation strategies should be considered for a project, not all will be appropriate for every project, and each project will involve a unique approach. The Walkability Checklist is tailored primarily for the new construction of residential and commercial mixed-use use projects. The Walkability Checklist addresses the following topics relevant to this analysis, each of which is discussed further below, as applicable: sidewalks; crosswalks/street crossings; building orientation; off-street parking and driveways; on-site landscaping; building façade; and building signage and lighting.

The Project would incorporate, where applicable, many of the implementation strategies presented in the Walkability Checklist, and would include a number of relevant design elements in order to foster a visually appealing pedestrian environment. The primary objectives defined for sidewalks address facilitating pedestrian movement and enriching the quality of the public realm by providing appropriate connections and street furnishings in the public right-of-way. Recommended implementation strategies that would be incorporated into the Project include creating a continuous and predominantly straight sidewalk and open space; creating a buffer between pedestrians and moving vehicles by the use of landscaping (i.e., rows of street trees along Hollywood Boulevard and Wilcox Avenue, pedestrian lighting); providing adequate sidewalk widths; utilize street furnishings to create a consistent rhythm; and incorporating closely planted shade-

producing street trees. The Project would also widen a portion of the sidewalk along Wilcox Avenue.

The Walkability Checklist strategies regarding crosswalks and street crossings do not apply to the Project because no crosswalks or street crossings are located or proposed within the Project Site.

Within the Walkability Checklist, building orientation addresses the relationship between building and street as a means of improving neighborhood character and the pedestrian environment. Recommended implementation strategies that would be incorporated into the Project include designing grade level entrances from the public right-of-way for pedestrians; creating primary entrances for pedestrians that are easily accessible from transit stops; making primary entrances to buildings visible from the street and sidewalk; maintaining at least one entrance from the public way at retail establishments with doors unlocked during regular business hours; incorporating transitions from the sidewalk to the front door such as grade separation or landscaping; complying with ADA requirements at primary pedestrian entrances; providing direct access to building entrances from sidewalks and streets; locating buildings at the front property line or at the required setback to create a strong street wall; and using architectural features to provide continuity at the street where openings occur.

In terms of off-street parking and driveways, the primary objective of the Walkability Checklist is to ensure pedestrian safety. Recommended implementation strategies that would be incorporated into the Project include maintaining continuity of the sidewalk; locate parking behind buildings rather than directly exposed to the adjacent major street; accommodating vehicle access to and from the Project Site with as few driveways as possible; limiting the width of each driveway to the minimum width required; incorporate architectural features on parking structure facades that respond to the neighborhood context and that contribute to “placemaking”; illuminating all parking areas and pedestrian walkways; and using architectural features to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk and building wall.

The Walkability Checklist also calls for the use of on-site landscaping to contribute to the environment, add beauty, increase pedestrian comfort, add visual relief to the street, and extend the sense of the public right-of-way. As previously described, the Project would increase the amount of landscaping and provide streetscape improvements adjacent to the Project Site. In so doing, the Project would achieve the following implementation strategies: providing plantings that complement pedestrian movement and views, and providing plantings that complement the character of the built environment.

The Walkability Checklist objective related to building façades is to create/reinforce neighborhood identity and a richer pedestrian environment. As discussed above, the

Project would address many of the relevant implementation strategies, including incorporating different textures, colors, materials, screening, and distinctive architectural features that add visual interest; adding scale and interest to building façades by articulated massing; reinforcing the existing façade rhythm along the street with architectural elements; discouraging blank walls; providing windows at the street; and devoting 75 percent of façades for ground floor retail uses to pedestrian entrances and pedestrian-level display windows.

In addition, as intended in the Walkability Checklist, building signage and lighting would be designed to strengthen the pedestrian experience, neighborhood identity, and visual coherence. Project signage and lighting would be designed to achieve the following in support of the Walkability Checklist: including signage at a height and of a size that is visible to pedestrians, assists in identifying the structure and its use, and facilitates access to the building entrance; providing adequate lighting levels to safely light pedestrian paths; utilizing adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage; and using fixtures that are “dark sky” compliant. No off-premises billboard advertising is proposed as part of the Project. The three existing billboards, located on the roof of the Attie Building, would remain.

Based on the Project elements previously described and the analysis herein, the Project would support the applicable Walkability Checklist objectives and implement relevant strategies. As such, the Project would not conflict with the relevant aspects of the Walkability Checklist.

(4) Hollywood Redevelopment Plan

The Project Site is currently designated as Regional Center Commercial by both the Community Plan and the Redevelopment Plan. The Project would construct a mixed-use development consisting of residential uses and community-serving retail, office, and restaurant uses. According to Section 506.2 of the Redevelopment Plan, Regional Center Commercial uses shall generally provide goods and services which are designed in a manner that appeals to a regional market as well as to local markets and includes uses such as theaters, restaurants, hotels, offices, and retail or service businesses. Thus, the types of land uses proposed by the Project would be consistent with the existing Regional Center Commercial land use designation.

As set forth in Section 506.2.3 of the Redevelopment Plan, the Regional Center Commercial designation allows development at a FAR of 4.5:1, and imposes additional standards for approving projects with FARs of up to 6:1. As discussed in detail under Subsection 3.c.(3)(a)(iii) below, the Project would result in a maximum FAR of up to 4.5:1 with approval of a Vesting Zone/Height District change. Therefore, the Project would be

consistent with the base FAR of 4.5:1 permitted under the Regional Center Commercial land use designation in the Redevelopment Plan.

Section 300 of the Redevelopment Plan sets forth 16 goals for the Redevelopment Plan. Of these, the relevant goals applicable to the Project include:

- Goal 3—Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors;
- Goal 7—Promote the development of Hollywood Boulevard within the Hollywood commercial core as a unique place which: a) reflects Hollywood's position as the entertainment center; c) contains active retail and entertainment uses at the street level; d) provides for residential uses; e) is pedestrian oriented; and g) recognizes and reinforces its history and architecture;
- Goal 9—Provide housing choices and increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes; and to provide home ownership opportunities and other housing choices which meet the needs of the resident population;
- Goal 10—Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, traffic and circulation programming, development of open spaces and other support services necessary to enable residents to live and work in Hollywood;
- Goal 11—Recognize, promote and support the retention, restoration and appropriate reuse of existing buildings, groupings of buildings and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria;
- Goal 12—Support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking and mass transit systems with an emphasis on serving existing facilities and meeting future needs.

The Project would contribute to these goals. Specifically, the Project would contribute to Goal 3 by providing a mix of residential and community-serving retail, office, and restaurant uses that would promote a balanced community within the Redevelopment Area. The Project would contribute to Goal 7 by introducing new retail and restaurant uses at the street level with human-scale frontage designs, which would complement or borrow historic and architectural cues of the Attie Building. The Project would also provide landscaping and a courtyard along the pedestrian walkways to engage the public, while residential amenities would also be offered to residents of the proposed mixed-use

building. The Project would contribute to Goal 9 by providing 260 new residential units consisting of a mix of 20 studios, 140 one-bedroom units, 87 two-bedroom units, and 13 three-bedroom units in varying sizes and configurations. Thus, the Project would increase the supply of housing in the Hollywood community, provide additional housing choices, and improve the quality of housing for a range of household types within the Redevelopment Area. In conformance with Goal 10, Project would provide new mixed-use development on an infill site in conformance with the Redevelopment Plan's use and density standards, without intruding on nearby residential neighborhoods. Moreover, as discussed in Section IV.H.1, Public Services—Fire Protection; Section IV.H.2, Public Services—Police Protection; Section IV.H.3, Public Services—Schools; Section IV.H.4, Public Services—Libraries; Section IV.H.5, Public Services—Parks and Recreation; Section IV.I, Transportation/; Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure; Section IV.K.2, Utilities and Service Systems—Wastewater; and Section IV.K.3, Utilities and Service Systems—Energy Infrastructure, of this Draft EIR, public facilities would not be significantly impacted by the Project, and the Project would provide on-site open space and recreational amenities to support its residents and visitors. With respect to Goal 11, the Project would rehabilitate and restore the existing Attie Building and the proposed new development would take design cues from nearby historic Hollywood buildings. Furthermore, the Project would support Goal 12 by promoting the use of public transportation and a reduction in vehicle miles traveled by concentrating new development in a designated HQTAs and TPAs. Specifically, Metro and LADOT would provide a variety of transit options to Project residents and visitors, including bus lines along Hollywood Boulevard and the Metro Hollywood/Vine Station located approximately 0.25 mile east of the Project Site. The Project would also provide a total of 304 bicycle parking spaces, including 286 short- and long-term residential spaces and 18 short- and long-term commercial spaces that would promote the use of alternative transportation. Based on the analysis above, the Project would not conflict with the applicable goals, objectives, and policies of the Redevelopment Plan.

(ii) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS)

The Project's general consistency with the applicable goals, objectives, and policies set forth in the 2016–2040 RTP/SCS is discussed in detail in Table 5 of Appendix H of this Draft EIR. As detailed therein, the Project would be generally consistent with the whole of applicable goals, objectives, and policies set forth in the 2016–2040 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, the Project would support the goals of the 2016–2040 RTP/SCS to maximize the productivity of the region's transportation system as well as protect the environment and health of the region's residents by improving air quality and encouraging active transportation (e.g., bicycling and walking). The Project would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area, including the Project Site. In addition, the Project Site is served by a variety of

nearby mass transit options, including a number of bus lines. The availability and accessibility of public transit in the vicinity of the Project Site is documented by the Project Site's location within a SCAG-designated HQTAs and TPAs, as defined PRC Section 21099. In addition, the Project would provide bicycle parking spaces for the proposed uses that would serve to promote walking and use of bicycles. The Project would also include adequate parking to serve the proposed uses and would provide charging stations to serve electric vehicles. As such, the Project would maximize mobility and accessibility by providing opportunities for the use of several modes of transportation, including convenient access to public transit and opportunities for walking and biking. Therefore, the Project would not conflict with the applicable goals, objectives, and policies of the 2016–2040 RTP/SCS.

(iii) Conclusion

Based on the analysis provided above, the Project would not conflict with the whole of applicable goals, objectives, and policies in local and regional plans that were adopted to mitigate or avoid an environmental effect. Therefore, the Project would not be in substantial conflict with relevant environmental policies in applicable plans. As such, impacts related to land use consistency would be less than significant.

(6) Noise

(a) Construction Noise

(i) Off-Site Noise

In addition to on-site construction noise sources, other noise sources may include materials delivery, concrete mixing, and haul trucks (construction trucks), as well as construction worker vehicles accessing the Project Site during construction. Typically, construction trucks generate higher noise levels than construction worker vehicles. The major noise sources associated with off-site construction trucks would be associated with delivery/haul trucks. Construction delivery/haul trucks would travel between the Project Site and US-101 via Highland Avenue, Cahuenga Boulevard, and Hollywood Boulevard.

The peak period of construction with the highest number of construction trucks would occur during the parking structure foundation phase.⁷³ Based on information provided by MATT Construction, the Project's construction consultant, this phase, there would be a maximum of 131 construction trucks (121 concrete trucks and 10 material delivery trucks) coming to and leaving the Project Site (equal to 262 total trips) per day. In

⁷³ Gibson Transportation Consulting, Inc., June 2018, see Appendix O.1 of this Draft EIR.

addition, there would be a total of 100 worker trips to and from the Project Site on a daily basis during the foundation phase. There would also be construction delivery truck trips (up to 154 truck trips per day) during other construction phases of the Project, but such trips would be less than the 262 truck trips under the foundation phase.

Table IV.G-12 in Section IV.G, Noise, of this Draft EIR, provides the estimated number of construction-related trips, including haul/delivery trucks and worker vehicles, and the estimated noise levels along the anticipated haul route(s). As indicated in Table IV.G-12, the noise levels generated by construction trucks during all stages of Project construction would be consistent with the existing daytime ambient noise levels along the anticipated haul route(s) and therefore would be below applicable 5-dBA significance criteria. **Therefore, temporary noise impacts from off-site construction traffic would be less than significant.**

(b) Operational Noise

(i) On-Site Stationary Noise Sources

(1) Mechanical Equipment

As part of the Project, new mechanical equipment (e.g., air ventilation equipment) would be located at the roof level and within the building structure (e.g., garage exhaust fans). Although operation of this equipment would generate noise, Project-related outdoor mechanical equipment would be designed so as not to increase the existing ambient noise levels by 5 dBA in accordance with the City's Noise Regulations. Specifically, the Project would comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, as provided above in Project Design Feature NOI-PDF-2, all outdoor mounted mechanical equipment would be enclosed or screened from off-site noise-sensitive receptors. Table IV.G-13 in Section IV.G, Noise, of this Draft EIR presents the estimated noise levels at the off-site receptor locations from operation of the Project mechanical equipment. As indicated in Table IV.G-13, the estimated noise levels from the mechanical equipment would range from 27.7 dBA (L_{eq}) at receptor location R4 to 34.1 dBA (L_{eq}) at receptor location R1, which would be below the existing ambient noise levels. As such, the estimated noise levels at all off-site receptor locations would be below the significance criteria of 5 dBA (L_{eq}) above ambient noise levels (based on the lowest measured ambient). **Therefore, noise impacts from mechanical equipment would be less than significant.**

(2) Outdoor Spaces

As discussed in Section II, Project Description, of this Draft EIR, the Project would include various outdoor open space areas, including: two outdoor courtyards at Level 1

(ground level); a pool deck and a courtyard at Level 4; and a sky deck at Level 12. Noise sources associated with outdoor uses typically include noise from people gathering and conversing. For this operational noise analysis, reference noise levels of 65 dBA for a male and 62 dBA for a female speaking in a raised voice were used for analyzing potential noise impacts from people gathering at the outdoor spaces.⁷⁴ In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. In addition, the hours of operation for use of the outdoor areas were assumed to be from 7:00 A.M. to 10:00 P.M.

An additional potential noise source associated with outdoor uses would be the use of an outdoor sound system (e.g., music or other sounds broadcast through an outdoor mounted speaker system). As set forth in Project Design Feature NOI-PDF-3, the amplified sound system used in outdoor areas would be designed so as not to exceed the maximum noise levels of 75 to 95 dBA L_{eq} as indicated in Table IV.G-14 in Section IV.G, Noise, of this Draft EIR, thereby ensuring that the amplified sound system would not exceed the significance criteria (i.e., an increase of 5 dBA L_{eq}) at any off-site noise-sensitive receptor location. Table IV.G-14 presents the anticipated number of people at each of the outdoor spaces and the Project's maximum amplified sound levels.

Table IV.G-15 in Section IV.G, Noise, of this Draft EIR presents the estimated noise levels at the off-site sensitive receptors resulting from the use of outdoor areas. The estimated noise levels were calculated with the assumption that all of the outdoor spaces would be fully occupied and operating concurrently to represent a worst-case noise analysis. As presented in Table IV.G-15, the estimated noise levels from the outdoor spaces would range from 48.7 dBA (L_{eq}) at receptor R2 to 61.0 dBA (L_{eq}) at receptor R5 and would be below the significance criteria of 5 dBA (L_{eq}) above ambient noise levels (based on the lowest measured ambient noise level). **As such, noise impacts from the use of the outdoor areas would be less than significant.**

(3) Parking Facilities

As discussed in Section II, Project Description, of this Draft EIR, the Project would include 420 vehicular parking spaces. Parking would be provided in two levels of subterranean, one level of at-grade, and two levels of above-ground parking. Sources of noise within the parking garage would primarily include vehicular movements and engine noise, doors opening and closing, and intermittent car alarms. Noise levels within the parking garage would fluctuate with the amount of automobile and human activity. Since the subterranean parking levels would be fully enclosed on all sides, noise generated within

⁷⁴ Harris, Cyril M., *Handbook of Acoustical Measurements and Noise Control*, Third Edition, 1991, Table 16.1.

the subterranean parking garage would be effectively shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. The at- and above-grade parking levels would be located at the interior of the building and would be enclosed. Table IV.G-16 in Section IV.G, Noise, of this Draft EIR, presents the estimated noise levels from the at- and above-grade parking levels at the off-site receptor locations. As indicated in Table IV.G-16, the estimated noise levels from the Project parking garage would be below the significance criteria of 5 dBA (L_{eq}) above the ambient noise levels (based on the lowest measured ambient). **Therefore, noise impacts from the parking garage would be less than significant.**

(4) Loading Dock and Trash Collection Areas

The Project loading dock and trash compactor would be located within building Level 1. Delivery trucks would access the loading docks through the entrance driveway from Wilcox Avenue. Noise sources associated with the loading dock and trash collection area would include delivery/trash collection trucks and operation of the trash compactor. Based on measured noise levels from typical loading dock facilities and trash compactors, delivery/trash collection trucks and trash compactors could generate noise levels of approximately 71 dBA (L_{eq}) and 66 dBA (L_{eq}), respectively, at a distance of 50 feet.⁷⁵ The loading dock and trash collection area would be buffered from the off-site sensitive receptors by being located within the building. Table IV.G-17 in Section IV.G, Noise, of this Draft EIR, presents the estimated noise levels at the off-site receptor locations from operation of the loading dock and trash compactor. As indicated in Table IV.G-17, the estimated noise from the loading dock and trash compactor range from 26.7 dBA (L_{eq}) at receptor location R4 to 50.2 dBA (L_{eq}) at receptor location R3. The estimated noise levels from the loading dock and trash compactor at all off-site receptor locations would be below the significance criteria of 5 dBA (L_{eq}) above ambient noise levels. **Therefore, noise impacts from loading dock and trash compactor operations would be less than significant.**

(5) Summary of On-Site Stationary Noise Sources

On-site stationary noise impacts would not result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impacts would be less than significant and no mitigation measures are required.

⁷⁵ *RK Engineering Group, Inc., Wal-Mart/Sam's Club Reference Noise Level Study, 2003.*

(ii) *Off-Site Mobile Noise Sources*

(1) Future Plus Project

Future roadway noise levels were calculated along 24 roadway segments in the vicinity of the Project Site. The roadway noise levels were calculated using the traffic data provided in the Traffic Study prepared for the Project, which is included in Appendix O.1 of this Draft EIR. As discussed in the Traffic Study, the Project is expected to generate a net increase of 1,625 daily trips. As such, Project-related traffic would increase the existing traffic volumes along the roadway segments in the study area when compared with Future without Project conditions. This increase in roadway traffic was analyzed to determine if any traffic-related noise impacts would result from operation of the Project.

Table IV.G-18 in Section IV.G, Noise, of this Draft EIR, provides a summary of the roadway noise impact analysis. The calculated CNEL levels are conservatively calculated in front of the roadways and do not account for the presence of any physical sound barriers or intervening structures. As shown in Table IV.G-18, the Project would result in a maximum increase of up to 0.2 dBA (CNEL) in traffic-related noise levels along the roadway segments of Wilcox Avenue (between Franklin Avenue and Sunset Boulevard). At other analyzed roadway segments, the increase in traffic-related noise levels would be 0.1 dBA or lower. The increase in traffic noise levels would be below the relevant 3 dBA CNEL significance criteria. **Therefore, traffic noise impacts under Future Plus Project conditions would be less than significant.**

(2) Existing Plus Project

The analysis of traffic noise impacts provided above was based on the incremental increase in traffic noise levels attributable to the Project as compared to Future Without Project conditions. An additional analysis was performed to determine the potential noise impacts based on the increase in noise levels due to Project-related traffic in addition to the existing baseline traffic noise conditions.

As shown in Table IV.G-19 in Section IV.G, Noise, of this Draft EIR, when compared with existing conditions, the Project would result in a maximum of a 0.3 dBA (CNEL) increase in traffic noise along the roadway segment of Wilcox Avenue (between Franklin Avenue and Hollywood Boulevard). At other analyzed roadway segments, the increase in traffic-related noise levels would be 0.1 dBA or lower. The estimated increase in traffic noise levels as compared to existing conditions would be well below the relevant 3 dBA CNEL significance criteria. **Therefore, traffic noise impacts under Existing Plus Project conditions would be less than significant.**

(3) Summary of Off-Site Mobile Noise Sources

Off-site mobile noise impacts would not result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Impacts would be less than significant and no mitigation measures are required.

(iii) Land Use Compatibility

Based on the current measured ambient noise levels, the exterior noise levels at the Project Site would range from approximately 69.0 dBA CNEL at the ground level facing Wilcox Avenue (measured at receptor location R2) to up to 75.1 dBA CNEL at the ground level facing Hollywood Boulevard (measured at receptor location R1). The proposed residential units would face Wilcox Avenue and the proposed commercial uses would face Hollywood Boulevard. According to the City of Los Angeles Guidelines for Noise Compatible Land Uses, the Project Site would be considered “conditionally acceptable” for multi-family residential development (between 60 and 70 dBA CNEL) and “conditionally acceptable” for commercial development (between 67.5 and 77.5 dBA CNEL). In accordance with LAMC Section 91.1207.11.2 and Section 5.507 of the 2019 California Green Building Standards Code, the Project would include necessary noise insulation features, such as sound insulated glass windows and doors, to achieve an interior noise environment that does not exceed 45 dBA CNEL for residential uses and 50 dBA L_{eq} for non-residential uses. **Therefore, noise impacts associated with land use compatibility would be less than significant.**

(iv) Composite Noise Level Impacts from Project Operations

In addition to considering the potential noise impacts to neighboring noise-sensitive receptors from each specific on-site and off-site noise source (e.g., mechanical equipment, outdoor areas, parking facilities, loading dock and trash compactor, and off-site traffic), an evaluation of potential composite noise level increases (i.e., noise levels from all on-site noise sources combined) at the analyzed sensitive receptor locations was also performed. This evaluation of composite noise levels from all on-site project noise sources, evaluated using the CNEL noise metric, was conducted to determine the contributions at the noise-sensitive receptor locations in the vicinity of the Project Site.

Table IV.G-20 in Section IV.G, Noise, of this Draft EIR presents the estimated composite noise levels in terms of CNEL at the off-site sensitive receptor locations from the Project-related noise sources. As indicated therein, the Project would result in an increase in composite noise levels ranging from 0.1 dBA at receptor location R4 to 1.2 dBA at receptor location R5. The composite noise levels increase resulting from Project operation as measured at the off-site receptor location R4 would be below the 3-dBA significance threshold, as the composite (ambient plus Project) noise level (75.2 dBA CNEL) falls within

the clearly unacceptable land use category (75 CNEL and higher). Additionally, the composite (Project plus ambient) noise levels increase for receptor locations R1, R2, R3, R5, and R6 would be well below the 5-dBA significance threshold, as the composite noise levels at these receptor locations fall within the conditionally acceptable (60 to 70 CNEL) land use category.

Project operations would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the Project's operational noise impacts from on- and off-site sources would be less than significant

(c) Operational Vibration

Sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. As also discussed above, vehicular-induced vibration, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. Building mechanical equipment installed as part of the Project would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission so vibration would not be perceptible at the off-site sensitive receptors. **Therefore, operation of the Project would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of the Project would be less than significant.**

(7) Public Services—Fire Protection

(a) Construction

Construction activities have the potential to result in accidental on-site fires. Given the nature of construction activities and the work requirements of construction personnel, the Occupational Safety and Health Administration (OSHA) has developed safety and health provisions for implementation during construction, which are set forth in 29 CFR, Part No. 1926. In accordance with these regulations, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA.⁷⁶

⁷⁶ *United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection (Footnote continued on next page)*

Additionally, in accordance with the provisions of OSHA regulations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site.⁷⁷ Project construction would also occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, compliance with regulatory requirements would effectively reduce the potential for project construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Project construction could also potentially impact the provision of LAFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Specifically, as discussed in the Project's Traffic Study included as Appendix O.1 of this Draft EIR, while construction activities would primarily be contained within the boundaries of the Project Site, access to the Project Site and the surrounding vicinity could be impacted by temporary lane closures, roadway/access improvements, and the construction of utility line connections. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, Project construction activities could temporarily increase response times for emergency vehicles along Hollywood Boulevard and Wilcox Avenue, and other main connectors due to travel time delays caused by traffic during the Project's construction phase. However, as discussed in the Project's Traffic Study, of this Draft EIR, construction-related traffic, including hauling activities and construction worker trips, would occur outside the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR, to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The Project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, the drivers of emergency vehicles normally have a

and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed January 9, 2020.

⁷⁷ *United States Department of Labor. Occupational Safety & Health Administration. Title 29 CFR, Part No. 1926, Part Title: Safety and Health Regulations for Construction, Subpart F, Subpart Title: Fire Protection and Prevention, www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10671, accessed January 9, 2020.*

variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Since emergency access to the Project Site would remain unobstructed during construction of the Project, impacts related to LAFD emergency access would be less than significant.

Project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services. Therefore, impacts to fire protection and emergency medical services during Project construction would be less than significant, and no mitigation measures are required.

(b) Operation

The analysis of the Project's potential operational impacts on LAFD services addresses potential impacts associated with LAFD resources and equipment, response distances and access, and the ability of the fire water infrastructure system to provide the necessary fire flows.

(i) Facilities and Equipment

The Project Site is expected to continue to be served by Fire Station No. 27, the "first-in" station for the Project Site, located approximately 0.4 mile south of the Project Site. As shown in Table IV.H.1-1 in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, Fire Station No. 27 is equipped with one engine, one truck, two ambulances, and one Urban Search and Rescue apparatus. Fire Station No. 27 houses one battalion chief, two captains, two engineers, 13 firefighters, two paramedics, and one apparatus operator, one chief. In addition, Fire Station No. 82 and No. 41, located approximately 0.9 mile and 1.3 miles east and southwest of the Project Site, respectively, would continue to be available to serve the Project Site in the event of an emergency. Fire Station No. 82, previously located at 1800 North Bronson Avenue, was recently replaced by a new station located at 5769 Hollywood Boulevard that includes upgraded fire protection systems. The new Fire Station No. 82 is equipped with one ambulance and one engine; and houses one captain, one engineer, one apparatus operator, two paramedics, and three firefighters. Fire Station No. 41 is equipped with one engine, one truck, and one ambulance; and houses one captain, one engineer, one apparatus operator, one paramedic, and two firefighters.

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by four low-rise commercial buildings that comprise a total of 29,200 square feet of floor area, as well as surface parking, which currently generate

demand for LAFD fire protection and emergency medical services. However, the Project Site currently does not contain any housing units and there is currently no residential population on the Project Site that would require LAFD fire protection and emergency medical services. The Project would include the development of 260 residential units, 33,750 square feet of open space, and 17,800 square feet of commercial and office uses, which would generate a new residential population in the service area of Fire Station No. 27.

As discussed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, according to the 2017 American Community Survey, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.42 persons per unit.^{78,79} Applying this factor, development of 260 units would result in a net increase of approximately 630 residents. In addition, the Project's 17,800 square feet of commercial and office uses would generate approximately 39 employees. Therefore, the Project's population would increase the demand for LAFD fire protection and emergency medical services. However, the Project would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. While the Project Site would be located within the required response distance from a fire station with an engine or truck company (i.e., Fire Station No. 27), pursuant to LAMC Section 57.507.3.3, the Project would be required to be constructed with automatic fire sprinkler systems because it meets the LAMC definition of a high-rise building. In addition, to enhance fire safety, as provided in Project Design Feature FIR-PDF-1, above, the Project includes the

⁷⁸ *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. As discussed further below, this rate still provides a conservative analysis.*

⁷⁹ *The draft Hollywood Community Plan Update being prepared by the City utilizes an estimated household size of 1.98 persons per unit. However, unlike the American Community Survey, which takes into account different unit sizes when estimating average household sizes ranging from 2 persons per unit to 2.42 persons per unit, the Hollywood Community Plan Update's projected household size of 1.98 persons per unit does not take into account different unit sizes. Thus, for projects containing two-bedroom and larger units, it is more conservative to utilize the average household size calculated using data from the American Community Survey 5-year average rather than the draft Hollywood Community Plan Update. Therefore, because the Project proposes a range of studio, one-bedroom, and two-bedroom units, this Draft EIR assumes the higher 2.42 persons per unit factor to provide a more conservative analysis.*

installation of automatic fire sprinklers in all non-high-rise buildings, which would further augment fire suppression building techniques and fire code requirements.

Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided on site. In addition, in accordance with the fire protection-related goals, objectives, and policies set forth in the Framework Element, the Safety Element, and the Hollywood Community Plan, as listed in the regulatory framework above, the City, along with LAFD, would continue to monitor the demand for existing and projected fire facilities (Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Fire Protection Policy 1 of the Hollywood Community Plan) and coordinate the development of new fire facilities to be phased with growth (Objective 9.18 of the Framework Element).

(ii) Response Distance and Emergency Access

Pursuant to LAMC Section 57.507.3.3, for land uses in the Industrial and Commercial category, which includes the Project Site, the required response distance from a fire station with an engine company is 1 mile, and the required response distance from a truck company is 1.5 miles. Fire Station No. 27, which would serve as the "first-in" fire station to the Project Site, is located approximately 0.4 mile south of the Project Site and is equipped with one engine, one truck, two ambulances, and one Urban Search and Rescue apparatus. In addition, Fire Station No. 82 is located approximately 0.9 mile east of the Project Site and is equipped with one ambulance and one engine. Therefore, the Project would fall within the LAFD's maximum prescribed response distances from a fire station with an engine company and a truck company.

As described in Section II, Project Description, of this Draft EIR, vehicular access to the Project Site, including access for emergency vehicles, would be provided via a new driveway on Wilcox Avenue. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by traffic. However, the area surrounding the Project Site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets, which provide regional, sub-regional, and local access and circulation within the Project vicinity. Based on the Project Site's location within a highly urbanized area of the City, the streets surrounding the Project Site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature. Therefore, the street system surrounding the Project Site is not considered substandard. In addition, the 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. Therefore, the increase in traffic generated by the Project would not significantly impact emergency vehicle access to the Project Site and

surrounding area. Furthermore, the Project's driveways and internal circulation would be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, and which are required prior to the issuance of a building permit. The Project also would not include the installation of barriers that could impede emergency vehicle access. As such, emergency access to the Project Site and surrounding uses would be maintained and Project-related traffic is not anticipated to impair the LAFD from responding to emergencies at the Project Site or the surrounding area.

(iii) Fire Flow

As described in Section IV.K.1, Utilities and Service Systems—Water Supply, of this Draft EIR, domestic and fire water service to the Project Site would continue to be supplied by LADWP. Fire flow to the Project would be required to meet City fire flow requirements. As previously discussed, LAMC Section 57.507.3.1 establishes fire flow standards by development type. Initial discussions with LAFD indicated a fire flow of 12,000 gpm flowing from eight hydrants simultaneously would be required, which would require the installation of an eighth fire hydrant on Wilcox Avenue adjacent to the Project Site. However, subsequent communication with LAFD confirmed the Project falls within the Industrial and Commercial category, which has a required minimum fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a minimum pressure of 20 psi at full flow.

There are currently seven existing fire hydrants located near the Project Site; two are located at the southwestern and northeastern corners of the intersection of Hollywood Boulevard and Wilcox Avenue, two are located at the southwestern and northwestern corners of the intersection of Hollywood Boulevard and Cahuenga Boulevard, one is located at the northwestern corner of the intersection of Selma Avenue and Wilcox Avenue, one is located at the southwestern corner of the intersection of Selma Avenue and Cahuenga Boulevard, and one is located mid block along Cahuenga Boulevard between Hollywood Boulevard and Selma Avenue.⁸⁰ The eighth public fire hydrant would be installed on Wilcox Avenue in front of the Project Site. The Fire Flow Availability Report indicates adequate pressure and flow would be available to meet the required fire flow of 6,000 gpm to 9,000 gpm from four to six adjacent fire hydrants flowing simultaneously with a minimum pressure of 20 psi at full flow

⁸⁰ *Psomas, 1624 Wilcox Avenue Project, Utilities Technical Report, December 21, 2017.*

(iv) Conclusion

Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services. Therefore, impacts to during Project operation would be less than significant, and no mitigation measures are required.

(8) Public Services—Police Protection*(a) Construction*

Project construction would not generate a permanent population on the Project Site that would substantially increase the police service population of the Hollywood Service Area. The existing commercial uses on the Project Site currently generate a daytime population that may require police protection services. The demand for police protection services during construction of the Project Site would be offset by the removal of the existing commercial uses on the Project Site. Furthermore, the daytime population at the Project Site during construction would be temporary in nature. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to Project Design Feature POL-PDF-1, the Applicant would implement temporary security measures including security fencing, lighting, and locked entry to secure the Project Site during construction. With implementation of these measures, potential impacts associated with theft and vandalism during construction activities would be reduced, resulting in less demand for police protection services and associated government facilities.

Project construction activities could also potentially impact LAPD police protection services and response times within the Hollywood Service Area due to construction impacts on the surrounding roadways. As discussed in the Project's Traffic Study included as Appendix O.1 of this Draft EIR, access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. In addition, a construction traffic management plan, including a worksite traffic control plan, would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 in Section IV.I, Transportation, of this Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction traffic management plan would be developed in consultation with the Los

Angeles Department of Transportation (LADOT) and may include limiting potential lane closures to off-peak travel periods, to the extent feasible, and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, delineators, etc.) would also be utilized to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, construction-related traffic generated by the Project would not significantly impede the ability of the LAPD to respond to emergencies in the Project Site vicinity as 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, pursuant to CVC Section 21806.

Based on the above analysis, upon implementation of the Project design features and compliance with state law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site or surrounding area. Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD's service capability; accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Further, the Project would not cause a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project. **Impacts during Project construction would be less than significant.**

(b) Operation

As discussed in Section II, Project Description, of this Draft EIR, the Project would construct a mixed-use project with 260 residential units, 11,020 square feet of retail uses, 3,200 square feet of restaurant uses, and 2,580 square feet of office uses. The Project would introduce a new residential, employee, and visitor population to the Project Site and increase the police service population of the Hollywood Service Area.

The Project Site is served by the Hollywood Community Police Station located at 1358 Wilcox Avenue, approximately 0.4 mile south of the Project Site. The Hollywood Community Police Station is staffed by 352 sworn officers and a 32-person civilian support staff. As shown in Table IV.H.2-2 in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, using the Police Service Population Conversion Factors in the *L.A. City CEQA Thresholds Guide*, the Project's residential service population would be 793 persons, which would increase the existing LAPD residential service population in the Hollywood Service Area from 300,000 to 300,793 persons. When taking existing and proposed commercial uses into account, the Project would result in a net service population of 763 persons. Despite the increase in police service population, the officer-to-resident ratio for the Hollywood Service Area would remain at its current level of approximately 1.2 officers per 1,000 residents.

As shown in Table IV.H.2-1 in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, approximately 6,223 crimes were reported in the Hollywood Service Area for 2019, which equates to a crime rate of 20.74 crimes per 1,000 residents or 0.0207 crime per capita. Based on the assumption that the annual crime rate would remain constant at 0.0207 crime per capita, the Project's residential service population could potentially generate approximately 16 new crimes per year.⁸¹ This would increase the annual number of crimes reported in the Hollywood Service Area from 6,223 to 6,239 reported crimes per year, an increase of 0.26 percent. As provided above in Project Design Features POL-PDF-2 through POL-PDF-6, the Project would include numerous operational design features to enhance safety within and immediately surrounding the Project Site. Specifically, as set forth in Project Design Feature POL-PDF-2, the Project would include a closed circuit camera system and keycard entry for the residential buildings and the residential parking areas. In addition, pursuant to Project Design Features POL-PDF-3 and POL-PDF-4, the Project would include proper lighting of buildings and walkways to maximize visibility and provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The Project would also design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites, as provided in Project Design Feature POL-PDF-5. Furthermore, as specified in Project Design Features POL-PDF-6, the Applicant would submit a diagram of the Project Site showing access routes and other information that might facilitate police response. In addition to the implementation of these project design features, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. The Project's design features, as well as the Project's contribution to the General Fund, would help offset the Project-related increase in demand for police services. Therefore, the Project's impact on police services would be less than significant.

The following discussion of emergency response is provided for informational purposes only. The Project would introduce new uses to the Project Site, which would generate additional traffic in the Project vicinity. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806. Accordingly, Project operation, including traffic generated by the Project, would not cause a substantial increase in emergency response times due to traffic congestion.

⁸¹ *Total crimes generated by the Project = estimated crime rate of 0.0207 crime per capita x Project residential service population of 793 persons = 16 crimes.*

The Project does not include uses that would require additional specialized police facilities, such as military facilities, hazardous materials, or other uses that may warrant such facilities. However, the LAPD has concluded that based on its size, the Project could have a minor impact on police services in the Hollywood Service Area.⁸² However, based on the above analysis, the Project is not anticipated to generate a demand for new LAPD's facilities to serve the Project Site. Therefore, Project operation would not necessitate the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts.

Furthermore, as described under Subsection 3.b., consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and the protection of the public safety is the first responsibility of local government where local officials have an obligation to give priority to the provision of adequate public safety services. Thus, the need for additional police protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

Therefore, the Project would not result in a need to construct any new police facilities or modify any existing facilities. Accordingly, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or the need for new or physically altered governmental facilities the construction of which would cause significant environmental impacts. Impacts with regard to police protection would be less than significant.

(9) Public Services—Schools

(a) Construction

The Project would involve the development of 260 multi-family residential dwelling units and approximately 17,800 square feet of community-serving retail, office, and restaurant uses. The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project because construction workers move from construction site to construction site throughout the region as specific jobs are temporary/short-term in nature. Therefore, the construction employment generated by the Project would not result in a notable

⁸² See Appendix K of this Draft EIR.

increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. **Therefore, it is not anticipated that new or physically altered government facilities, the construction of which would cause significant environmental impacts, would be required and impacts would be less than significant.**

(b) Operation

The Project would directly generate students through the construction of 260 new multi-family residential uses. As noted above, the Project would also include development of community-serving retail and restaurant uses. While unlikely given the nature of this employment, the Project's commercial component could generate students as employees of the commercial uses may relocate to the Project Site vicinity. However, some of these jobs would be filled by existing residents who already generate a demand for school facilities in the area. As shown in Table IV.H.3-3 on in Section IV.H.3, Public Services—Schools, of this Draft EIR, using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate approximately 119 new students consisting of 67 elementary school students, 19 middle school students, and 39 high school students.

As discussed in Section II, Project Description, of this Draft EIR, the Project includes the removal of 29,200 square feet of commercial uses on the Project Site. As shown in Table IV.H.3-3, using the applicable LAUSD student generation rates, the existing commercial uses are expected to result in approximately 19 students, consisting of 10 elementary school students, 3 middle school students, and 6 high school students.

When accounting for the removal of the existing on-site commercial uses, the Project would result in a net increase of 106 students consisting of 57 elementary school students, 16 middle school students, and 33 high school students.

It should be noted that the number of Project-generated students who could attend LAUSD schools serving the Project Site would likely be less than the above estimate because this analysis does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options, some of which are discussed above, that may be available to Project students include the following:

- Open enrollment that enables students anywhere within LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;

- Magnet schools and magnet centers (such as Joseph Le Conte Middle School Center for Enriched Studies (CES) Communication and Arts Magnet, Joseph Le Conte Middle School Health/Engineering/Applied Sciences/Technology Magnet, Bancroft Middle School and Performing Arts/STE[+A]M Magnets, Hollywood High School Visual Performing Arts Magnet, Melrose Elementary School Science/Technology/Math Magnet, and Fairfax High School Visual Arts Magnet), which are open to qualified students in LAUSD;
- The Permits With Transportation Program, which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school.⁸³ LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within LAUSD;
- Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
- Child care permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

Based on existing enrollment and capacity data from LAUSD, only Hollywood High School would have adequate capacity to accommodate the new students generated by the Project under existing conditions. Selma Avenue Elementary School and Hubert Howe Bancroft Middle School would not have adequate existing capacity to serve the Project under existing conditions. Specifically, as shown in Table IV.H.3-4 in Section IV.H.3, Public Services—Schools, of this Draft EIR, with the addition of Project net generated students, Selma Avenue Elementary School would have a seating shortage of 38 students (i.e., existing capacity for 19 students less the Project net student generation of 57 students) and Hubert Howe Bancroft Middle School would have a seating shortage of 64 students (i.e., existing shortage of 48 students in addition to the Project net student generation of 16 students), while Hollywood High School would have a seating overage of 361 students (i.e., existing capacity for 394 students less the Project net student generation of 33 students).

⁸³ *A feeder pattern is the linkage from elementary school, middle school, and high school.*

With regard to projected future capacity, as shown in Table IV.H.3-5 in Section IV.H.3, Public Services—Schools, of this Draft EIR, Selma Avenue Elementary School would have a seating shortage of 47 students (i.e., future capacity for 10 students in addition to the Project net student generation of 57 students), Hubert Howe Bancroft Middle School would have a seating shortage of 80 students (i.e., future shortage of 64 students in addition to the Project net student generation of 16 students), and Hollywood High School would have a seating overage of 394 students (i.e., future capacity for 427 students less the Project net student generation of 33 students).

Pursuant to SB 50 the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995(h), the payment of these fees is considered full and complete mitigation of Project-related school impacts. Using these funding sources, LAUSD would be able to continue to implement the New School Construction Program, a multi-year capital improvement program, which aims to reduce overcrowding throughout LAUSD. **Therefore, payment of the applicable development school fees to LAUSD would allow LAUSD to provide adequate school facilities to serve the community, including new or expanded facilities as may be necessary. Accordingly, with adherence to existing regulations, impacts on school facilities would be less than significant and mitigation measures would not be required.**

(10) Public Services—Libraries

(a) Construction

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project because construction workers move from construction site to construction site throughout the region as specific jobs are temporary/short-term in nature. Therefore, Project-related construction workers would not result in a notable increase in the resident population within the service area of the Hollywood Regional Branch Library, the Will and Ariel Durant Branch Library, or the John C. Fremont Branch Library; or an overall corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that

construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Furthermore, it is unlikely that construction workers would utilize library facilities at the end of the work day and would instead likely use library facilities local to their place of residence. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, which would result in the need for new or altered facilities, or substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. **Based on the above, Project construction would not result in the need for new or physically altered libraries, the construction of which would cause significant environmental impacts. Impacts would be less than significant, and no mitigation measures are required.**

(b) Operation

As described above, based on information provided by the LAPL, the Project Site is located within the service areas of the Hollywood Regional Branch Library, the Will and Ariel Durant Branch Library, and the John C. Fremont Branch Library.⁸⁴ These three libraries are located within a 2-mile radius of the Project Site, the distance that is generally considered to comprise the service area of a library.⁸⁵

As the Project Site does not currently include any housing, there are no residents on the Project Site that utilize the three identified libraries. 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.⁸⁶ Applying this factor, development of up to 260 units at the Project Site would result in a net population increase of approximately 630 residents. Thus, the Project's population would increase the demand for library services as compared to existing conditions. However, this estimate is likely overstated as it does not consider that much of the growth associated with the Project is already accounted for in the service population projections made by the LAPL based on SCAG projections. Current and future library service populations are summarized in Table IV.H.4-3 in Section IV.H.4, Public Services—Libraries, of this Draft EIR.

⁸⁴ *Written communication from Tom Jung, Management Analyst II, Business Office, Los Angeles Public Library, October 10, 2017. See Appendix M of this Draft EIR.*

⁸⁵ *L.A. CEQA Thresholds Guide, Section K.5, pg. K.5-2.*

⁸⁶ *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.*

As shown in Table IV.H.4-3 in Section IV.H.4, Public Services—Libraries, of this Draft EIR, Hollywood Regional Branch Library's current service population is approximately 100,006 persons. With the addition of the Project's 630 estimated residents, the service population of the Hollywood Regional Branch Library would increase to 100,636 persons. As noted above, under existing conditions, the Hollywood Regional Branch Library does not currently meet the building size standards set forth in the 2007 Branch Facilities Plan. The facility would, therefore, continue to be undersized with the addition of the Project's 630 new residents. There are currently no plans to expand this library or develop additional facilities to serve the area, and this library will continue to operate without meeting the recommended building size standards.

As shown in Table IV.H.4-3 in Section IV.H.4, Public Services—Libraries, of this Draft EIR, Will and Ariel Durant Branch Library's current service population is approximately 92,581 persons. With the addition of the Project's estimated 630 residents, the service population would increase to 93,211 persons. As noted above, under existing conditions, the Will and Ariel Durant Branch Library does not currently meet the building size standards set forth in the 2007 Branch Facilities Plan. The facility would, therefore, continue to be undersized with the addition of the Project's 630 new residents. There are currently no plans to expand this library or develop additional facilities to serve the area, and this library will continue to operate without meeting the recommended building size standards.

As shown in Table IV.H.4-3 in Section IV.H.4, Public Services—Libraries, of this Draft EIR, John C. Fremont Branch Library's current service population is 18,418 persons. With the addition of the Project's estimated 630 residents, the service population would increase to 19,048 persons. As noted above, under existing conditions, the John C. Fremont Branch Library does not currently meet the building size standards set forth in the 2007 Branch Facilities Plan. The facility would, therefore, continue to be undersized with the addition of the Project's 630 new residents. There are currently no plans to expand this library or develop additional facilities to serve the area and this library will continue to operate without meeting the recommended building size standards.

With regard to anticipated library service at Project buildout, as discussed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, the Southern California Association of Governments (SCAG) projects population growth for the City of Los Angeles Subregion. According to SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), the population of the City of Los Angeles Subregion is projected to grow by approximately 3.43 percent between

2017 (the Project's baseline year) and 2023 (the Project's build-out year).⁸⁷ As shown in Table IV.H.4-4 in Section IV.H.4, Public Services—Libraries, of this Draft EIR, applying this same growth rate to the service area of the Hollywood Regional Branch Library, the Will and Ariel Durant Branch Library, and John C. Fremont Branch Library, the estimated service populations for these libraries in 2023 would be 103,437 persons, 95,757 persons, and 19,050 persons, respectively.

Thus, with the addition of the Project's 630 estimated residents, in 2023, the service population of the 19,000-square-foot Hollywood Regional Branch Library would be 104,067 persons; the service population of the 12,500-square-foot Will and Ariel Durant Branch Library would be 96,387; and the service population of the 7,361-square-foot John C. Fremont Branch Library would be 19,680. As such, as is the case under existing conditions, these library facilities would not meet the building size standards set forth in the 2007 Branch Facilities Plan under future conditions. However, as noted above, there are currently no plans to expand these libraries or develop additional facilities to serve the area. These libraries will continue to operate without meeting the recommended building size standards.

The *L.A. CEQA Thresholds Guide* also considers whether a project includes features that would reduce the demand for library services. The Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.^{88,89} Furthermore, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate.⁹⁰ The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services.

With regard to the potential for the employees of the proposed uses to utilize nearby library facilities, as discussed in Section VI, Other CEQA Considerations,⁹¹ of this Draft

⁸⁷ According to SCAG's 2016–2040 RTP/SCS, the forecasted population for the City of Los Angeles Subregion in 2017 was approximately 3,981,911 persons (based on a linear interpolation of 2012–2040 data). In 2023, the City of Los Angeles Subregion is anticipated to have a population of approximately 4,145,604 persons (based on a linear interpolation of 2012–2040 data).

⁸⁸ Troll, Denise A., *How and Why Libraries are Changing: What We Know and What We Need to Know*, Carnegie Mellon University, 2002.

⁸⁹ Tenopir, Carol, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.

⁹⁰ City of Los Angeles, *Budget for the Fiscal Year 2017–18*.

⁹¹ Page VI-11.

EIR, the Project would generate approximately 52 employees. These new employment opportunities would include a range of full-time and part-time positions that would typically be filled by persons already residing in the vicinity of their workplace and who already generate a demand for the libraries in the vicinity of the Project Site. As such, any indirect or direct new demand for library services generated by employees of the proposed neighborhood-serving retail and restaurant uses would be negligible.

Based on the above, and pursuant to the library sizing standards recommended in the 2007 Branch Facilities Plan, operation of the Project would not create any new exceedance of the capacity of the Hollywood Regional Branch Library, the Will and Ariel Durant Branch Library, and the John C. Fremont Branch Library. Under both existing and future conditions, without or with the Project, the three identified libraries would continue operations without meeting the recommended building size standards. However, residents of the Project would likely frequent the Hollywood Regional Branch Library, which is the closest library to the Project. As such, to the extent that Project residents would travel farther within the 2-mile libraries service area, library usage would be expected to be dispersed between the primary regional branch library and the other two local branch libraries identified by the LAPL. Furthermore, as these three libraries are already undersized in existing conditions, the Project would not be anticipated to result in a substantial increase in demand that would necessitate new or physically altered facilities. **Therefore, the Project would not result in the need for new or altered facilities, or substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Impacts would be less than significant, and no mitigation measures are required.**

(11) Public Services—Parks and Recreation

(a) *Facilities*

(i) *Public Recreation Plan*

The Public Recreation Plan's recommended long-range standard for local parks for the City is 2 acres per 1,000 persons for neighborhood parks and 2 acres per 1,000 persons for community parks. However, the Public Recreation Plan also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of 1 acre per 1,000 persons for neighborhood parks and 1 acre per 1,000 persons for community parks. As stated above, the Hollywood Community Plan Area currently does not meet the Public Recreation Plan's desired short-, intermediate-, or long-range standards. However, as previously indicated, these standards are Citywide goals, not requirements, and are not intended to be used as requirements for individual development projects. In addition, the 2009 Citywide Community Needs Assessment states that since the time that the Public Recreation Plan was adopted in 1980, the distance many people are willing to travel to

parks and recreational facilities has increased substantially. Furthermore, the Hollywood Community Plan ratio does not include regional parks, such as Runyon Canyon Park and Griffith Park, which are located within the Hollywood Community Plan Area.

The Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Based on the estimated 630 residents that would be generated by the Project, the Project would need to provide approximately 1.3 acres of neighborhood parkland to meet the Public Recreation Plan's long-range standard of 2 acres per 1,000 residents and approximately 0.6 acre to meet the Public Recreation Plan's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents. Similarly, the Project would need to provide 1.3 acres of community parkland to meet the Public Recreation Plan's long-range standard for community parks of 2 acres per 1,000 residents and approximately 0.6 acre to meet the Public Recreation Plan's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents.

The Project does not propose any publicly accessible open space or dedication of land for park space. The Project does, however, provide approximately 29,650 square feet (0.68 acre) of common open space, as defined by LAMC Section 12.21 G. Therefore, the Project's 0.68 acre of common open space would fall short of the acreage required to meet the Public Recreation Plan's long-, intermediate-, and short-range standards for neighborhood and community parks. However, due to the Project's inclusion of common open space and recreational opportunities, the use of existing community parks in the area is anticipated to be reduced. Notwithstanding, Project residents would still be expected to utilize neighborhood and community park amenities, including sports fields, tennis courts, basketball courts, and children's play areas. Nonetheless, as previously stated, the Public Recreation Plan parkland standards are Citywide goals and do not constitute requirements for individual development projects.

Furthermore, compliance with regulatory requirements would ensure that the intent of the Public Recreation Plan's parkland standards would be met through compliance with State law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Such requirements include the provision of on-site open space, payment of the Dwelling Unit Construction Tax, and with the Project requiring approval of a Tentative Tract Map, as well as a zone change, compliance with the City's Quimby Act requirements through the dedication of parkland, payment of in-lieu fees, or provision of on-site recreational amenities and open space areas, or through a combination of these methods.

(ii) Los Angeles Municipal Code

As described above, LAMC Section 12.21-G requires that residential developments containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required to provide a total of 29,150 square feet of usable open space, as shown in Table IV.H.5-2 in Section IV.H.5, Public Services—Parks and Recreation, of this Draft EIR. The Project would provide a total of 33,750 square feet of usable open space, consisting of common open space (e.g., courtyards, deck, pool, etc.) and private open space (balconies) for its residents. Thus, the Project would meet the LAMC's requirement for the provision of usable open space.

According to LAMC Section 12.21-G, common open space must constitute at least 50 percent of the total required usable open space requirement. Therefore, the Project would be required to provide 14,575 square feet of common open space. The Project would provide 29,650 square feet of common open space, approximately 88 percent of the total usable open space provided. Additionally, per LAMC Section 12.21 G, a minimum of 25 percent of the common open space must be planted with ground cover, shrubs, and trees. Therefore, based on the required 14,575 square feet of common open space, the Project would be required to provide a minimum of 3,644 square feet of landscaped common open space. The Project would provide 6,745 square feet of common planted open space, which is anticipated to reduce demand for community parks near the Project Site.

In addition, LAMC Section 12.21-G generally requires that common open space be open to the sky; however, enclosed recreation rooms of at least 600 square feet or greater may count as common open space but cannot qualify for more than 25 percent of the total required usable open space. The Project would provide a 700-square-foot internet café on Level 1, a 950-square-foot theater on Level 2, a 2,000-square-foot gym and yoga studio on Level 4, and a 600-square-foot library/music room on Level 4. Overall, the enclosed recreation rooms within the Project would constitute a total of 4,250 square feet, or 15 percent of the total usable open space required. Furthermore, LAMC Section 12.21-G allows a maximum of 50 square feet of balcony area to be credited towards the usable open space requirement as private open space. Of the Project's 260 units, 70 residential units would include private balconies that are 50 square feet in size, which would contribute an additional 3,500 square feet of private open space towards the Project's useable open space requirement. With the addition of the square footage from the enclosed recreation rooms and the residential balconies, the Project would meet the useable open space requirements set forth in LAMC Section 12.21-G.

As previously stated, LAMC Section 17.12, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses

for residential subdivisions through parkland dedication, payment of in-lieu fees, and/or provision of on-site open space, subject to determination by the Advisory Agency. As the Project requires approval of a Tentative Tract Map to create three ground lots and three commercial condominiums, and a Zone Change/Height District Change, LAMC Sections 17.12 and 12.33 would require that approximately 1.44 acres be dedicated as parkland based on the Project's 260 proposed dwelling units. Thus, the Project would be required to dedicate a minimum of 1.44 acres as parkland, or pay in-lieu fees. Although the Project would not include dedicated parkland, as stated above, Section 17.12 provides that the Project be required to pay in-lieu fees as determined by the City or may have some or all of its common open space credited against its land dedication requirement if approved by the Advisory Agency. Through one or a combination of these methods, as determined by the City, parkland dedication impacts with regard to compliance with LAMC Sections 17.12 and 12.33 would be less than significant. Payment of these fees allow the City to implement programs such as the 50 Parks Initiative which focuses on increasing the number of parks in densely populated neighborhoods and communities that lack sufficient open space and recreational services.

(iii) Conclusion

Based on the above, the Project would meet on-site open space requirements per LAMC Section 12.21-G and would meet its parkland dedication requirements through either off-site dedication of parkland, payment of in-lieu fees, or a combination of these methods, as determined by the City. **Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks. Impacts would be less than significant and no mitigation measures would be required.**

(b) Use of Existing Parks

(i) Construction

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project because construction workers move from construction site to construction site throughout the region as specific jobs are temporary/short-term in nature. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

During Project construction, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is a potential for construction workers to spend their lunch breaks at parks and recreational facilities that may be located in proximity to the Project Site, specifically Selma Park, at 6657 Selma Avenue, approximately 0.2 mile southwest of the Project Site. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes).

There are no parks or recreational facilities adjacent to the Project Site along Hollywood Boulevard or Wilcox Avenue. Therefore, Project construction would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. The Project's proposed haul route options from the Project Site would include use of Hollywood Boulevard to/from US-101. The haul route would not travel adjacent to any public park or recreational facility.

Based on the above analysis, Project construction would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. **Therefore, impacts on parks and recreational facilities during Project construction would be less than significant, and mitigation measures would not be required.**

(ii) Operation

As discussed in Section II, Project Description of this Draft EIR, the Project Site is currently occupied by four low-rise commercial buildings that comprise a total of 29,200 square feet of floor area, as well as surface parking. The Project would consist of 260 multi-family residential units and approximately 17,800 square feet of retail, restaurant, and office uses upon completion. As no housing currently exists on the Project Site, there are currently no residents on the Project Site that generate a demand for parks and recreational facilities in the Project vicinity. As discussed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, the Project's new residential units would introduce an estimated residential population of 630 persons, based on the most recent estimated household size of 2.42 persons per unit for multi-family housing

units in the City of Los Angeles area.⁹² The population increase associated with the Project would generate increased demand for parks and recreational facilities in the Project vicinity.

The Project would include various amenities to serve the needs of residents and guests, including landscaped open space, a pool, gym and yoga studio, and other amenities, as described in Section II, Project Description, of this Draft EIR. Per LAMC Section 12.21 G, the Project is required to provide 29,150 square feet of open space, and would provide 33,750 square feet of open space.

Due to the amount, variety, and availability of the proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's estimated 630 residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similarly, 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,⁹³ would result in a negligible indirect demand for parks and recreational facilities, which would be further off-set by the net reduction in employees attributed to the removal of the Project Site's existing uses. Furthermore, as discussed above, the Project would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1) and in-lieu parkland fees in accordance with LAMC Sections 12.33 and 17.12 for the purpose of acquiring, expanding, and improving park and recreational facilities for new residents. Therefore, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

(iii) Conclusion

The Project would not significantly increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical

⁹² 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.

⁹³ Based on employee generation factors provided in the 2018 LAUSD Developer Fee Justification Study, March 2018.

deterioration of the facility would occur or be accelerated. Therefore, impacts to parks and recreational facilities would be less than significant, and no mitigation measures would be required.

(c) Construction of Recreational Facilities

The Project does not include construction of a park. With respect to on-site facilities, as detailed above, the Project would comply with regulations regarding open space and recreational facilities. In addition, although the Project would introduce a residential population that would generate a demand for parks and recreational facilities, Project residents would be anticipated to utilize the Project's on-site open space and recreational facilities to a greater extent than off-site facilities. **Therefore, the Project would not include or require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment. Impacts would be less than significant and no mitigation measures are required.**

(12) Transportation

(a) Consistency with Applicable Programs, Plans, Ordinances, and Policies

Table 2.1-2 in the Transportation Assessment Guidelines provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: LAMC Section 12.37; Mobility Plan policies 2.3 through 2.7 and 2.10; Mobility Plan Transit Enhanced Network, Pedestrian Enhanced Network, and Bicycle Enhanced Network Programs; Mobility Plan programs PL.1 and PK.10; Transit Oriented Community Guidelines; Vision Zero; and Citywide Design Guideline 2.⁹⁴ The Project's potential to conflict with these programs, plans, ordinances, and policies are analyzed below.

(i) Los Angeles Municipal Code

(b) Los Angeles Municipal Code

LAMC Section 12.37 pertains to development or expansion of buildings along highways and collector streets. Per Table 2.1-2 of the Transportation Assessment Guidelines, LAMC Section 12.37 also applies to streets designated Boulevard I, Boulevard II, Avenue I, Avenue II, and Avenue III in the Mobility Plan. Hollywood Boulevard is a designated Avenue I and Wilcox Avenue is a designated Modified Avenue III in the Mobility

⁹⁴ Table 2.1-2 of the Transportation Assessment Guidelines specifically references Citywide Design Guidelines 4.1.01 and 4.1.02. However, the Citywide Design Guidelines were updated in October 2019 and these designations no longer apply. Guidelines 4.1.01 and 4.1.02 are now incorporated into Guideline 2.

Plan. Per the Mobility Plan, Hollywood Boulevard adjacent to the Project Site requires a 35-foot half-width roadway within a 50-foot half-width right-of-way and Wilcox Avenue adjacent to the Project Site requires a 20-foot half-width roadway within a 35-foot half-width right of way. Because Hollywood Boulevard and Wilcox Avenue adjacent to the Project Site meet the half-width roadway and right-of-way requirements of the Mobility Plan, the Project would not conflict with LAMC Section 12.37. In addition, no widening or roadway improvement conditions have been required by Bureau of Engineering or as mitigation measures for the Project.

(c) *Mobility Plan 2035*

(i) *Mobility Plan Policies 2.3 through 2.7 and 2.10*

Policy 2.3 Pedestrian Infrastructure—Recognize walking as a component of every trip, and ensure high quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment: While this is a citywide policy, the Project would support its implementation. Specifically, one of the primary objectives of the Project is to create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses. Streetscape amenities provided by the Project would include a row of street trees on Wilcox Avenue, pedestrian-scale lighting fixtures and elements, and landscaped outdoor seating areas. The Project is requesting a merger as part of a Vesting Tentative Tract Map request, resulting in the widening of the sidewalk by 5 feet along a portion of Wilcox Avenue, creating a 15-foot full width concrete sidewalk with tree wells, and locate vehicular loading and drop-off within the parking structure. Therefore, the Project would not conflict with Mobility Plan Policy 2.3.

Policy 2.4 Neighborhood Enhanced Network—Provide a slow speed network of locally serving streets: This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Therefore, the Project would not conflict with Mobility Plan Policy 2.4.

Policy 2.5 Transit Network—Improve the performance and reliability of existing and future bus service: While this is a citywide policy, the Project would not conflict with its implementation. As detailed in Table 4 of the Traffic Study included in Appendix O.1 of this Draft EIR, the transit system serving the Project Site has available capacity for 8,153 persons during the A.M. peak-hour and 7,197 persons during the P.M. peak-hour. The Project would generate approximately 30 net new transit trips during the A.M. peak hour and 35 net new transit trips during the P.M. peak hour, amounting to less than 0.5 percent of the available capacity during the A.M. or P.M. peak hours. Furthermore, in 2008, Los Angeles County voters approved Measure R, a half-cent sales tax increase to finance new transportation projects and accelerate projects already in progress and an additional half-cent sales tax increase to fund transportation projects through Measure M in 2016. As

such, the Project's net increase in transit trips would be partially offset by improvements to transit service in the Project area. Accordingly, it is concluded that the Project would not cause the capacity of the transit system to be substantially exceeded and the Project would not conflict with Mobility Plan Policy 2.5.

Policy 2.6 Bicycle Networks—Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities: While this is a citywide policy, the Project would support its implementation. As described in detail in Subsection 2.e.(2) in Section IV.I, Transportation, of this Draft EIR, the existing bicycle system in the study area consists of a limited coverage of bicycle lanes (Class II) and bicycle routes (Class III) and no dedicated bicycle lanes exist in the immediate vicinity of the Project Site. In the Mobility Plan, Tier 1 Protected Bicycle Lanes are proposed along Hollywood Boulevard as part of the Bicycle Enhanced Network (a network of protected bicycle lanes and bicycle paths that provide a higher level of comfort for a variety of users). In addition, as part of the Bicycle Lane Network (a network of arterial roadways that will receive striping treatments to prioritize bicyclists), Tier 2 Bicycle Lanes are proposed on Vine Street south of Yucca Street, Wilton Place between Franklin Avenue and Sunset Boulevard, Yucca Street between Cahuenga Boulevard and Vine Street, and Tier 3 Bicycle Lanes are proposed on Highland Avenue, Cahuenga Boulevard north of Hollywood Boulevard, and Sunset Boulevard. Furthermore, Project visitors, patrons, and employees arriving by bicycle would have the same access opportunities as pedestrian visitors. Bicycle parking requirements per LAMC Section 12.21-A,16(a) include short-term and long-term parking. Short-term bicycle parking is characterized by bicycle racks that support the bicycle frame at two points. Long-term bicycle parking is characterized by an enclosure protecting all sides from inclement weather and secured from the general public. As shown in Table IV.I-1 in Section IV.I, Transportation, of this Draft EIR, based on LAMC Section 12.21-A,16(a), and the permitted reductions in vehicular parking spaces described above, the Project would be required to provide a minimum of 304 bicycle parking spaces (35 short-term and 269 long-term bicycle parking spaces). Therefore, the Project would not conflict with Mobility Plan Policy 2.6.

Policy 2.7 Vehicle Network—Provide vehicular access to the regional freeway system: This is a citywide policy that does not apply to the Project because no changes to the adjacent streets are proposed as part of the Project. Primary regional access would continue to be provided by US-101 located approximately 0.4 mile east of the Project Site. Access to and from US-101 is available via interchanges at Franklin Avenue, Gower Street, and Hollywood Boulevard. Therefore, the Project would not conflict with Mobility Plan Policy 2.7.

Policy 2.10 Loading Areas—Facilitate the provision of adequate on and off-street loading areas: The Project would include a loading area within Level 1 and shielded from the public right-of-way by the commercial uses on Wilcox Avenue. As such, delivery trucks

would not encroach on or block the public right-of-way. Therefore, the Project would not conflict with Mobility Plan Policy 2.10.

(ii) Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network

As discussed above in the analyses for Policy 2.5 and 2.6, the Project would not conflict with Mobility Plan policies related to transit and bicycle networks. With respect to pedestrian facilities, vehicular access to the Project Site would be provided by a two-way ingress and egress driveway on Wilcox Avenue. Pedestrian access to the community-serving retail, office, and restaurant components of the Project would be provided via sidewalks along Hollywood Boulevard and Wilcox Avenue. Pedestrian access to the residential building would be provided via a residential lobby located along Wilcox Avenue. Additionally, as noted above, the sidewalk along Wilcox Avenue would be widened and upgraded with street trees as part of the Project. The Project access locations would be required to conform to City standards and would be designed to provide adequate sight distance, sidewalks, and/or pedestrian movement controls that would meet the City's requirements to protect pedestrian safety. In addition, the proposed driveways would be designed to limit potential impediments to visibility, and the Project would provide a direct and safe path of travel with minimal obstructions to pedestrian movement within and adjacent to the Project Site. Therefore, the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network.

(iii) Mobility Plan Programs PL.1 and PK.10

Mobility Plan Program PL.1 requires driveway access to buildings from non-arterial streets or alleys (where feasible) in order to minimize interference with pedestrian access and vehicular movement. Vehicular access to the Project Site would be provided via a new driveway on Wilcox Avenue for commercial and residential parking and loading and drop-off would occur within the parking structure. Therefore, the Project would not conflict with Mobility Plan Program PL.1.

Mobility Plan Program PK.10 directs the City to establish an incentive program to encourage projects to retrofit parking lots, structures, and driveways to include pedestrian design features. While this is a citywide program, the Project would not conflict with its implementation. Specifically, as discussed in the Initial Study included as Appendix A of this Draft EIR, the design and implementation of the new driveway would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Therefore, the Project would not conflict with Mobility Plan Program PK.10.

(d) Transit Oriented Community Guidelines

The Transit Oriented Community (TOC) Guidelines provide the eligibility standards, incentives, and other necessary components of the TOC program. While the Project Site is located in a Tier 3 TOC, the Project is not seeking incentives under the TOC program. Therefore, the TOC Guidelines do not apply to the Project.

(e) Vision Zero

Hollywood Boulevard has been identified in the High Injury Network. While no Vision Zero Safety Improvements are currently planned near the Project Site,⁹⁵ Project improvements to the pedestrian environment would not preclude future improvements by the City. Therefore, the Project would not conflict with Vision Zero.

(f) Citywide Design Guideline 2

Citywide Design Guideline 2 recommends incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting parking and driveways toward the rear or side of buildings and away from the public right of way; and on corner lots, orienting parking as far from the corner as possible. The Project would prioritize pedestrian access by providing multiple pedestrian access points on both Hollywood Boulevard and Wilcox Avenue, and a single driveway for vehicular access which would be located on the west side of the building on Wilcox Avenue. The Project would also maintain continuity of the sidewalk by including only one curb cut on the Project Site. Therefore, the Project would not conflict with Citywide Design Guideline 2.

(g) Other Programs, Plans, Ordinances, and Policies

The Project would not conflict with the Plan for a Healthy Los Angeles, Hollywood Community Plan, LAMC Section 12.26J (TDM Ordinance), Walkability Checklist, Mobility Hub Reader's Guide, or LADOT Manual of Policies and Procedures (Design Standards). Specifically, the Project would support the Plan for a Healthy Los Angeles by locating housing and jobs near transit, as well as enhancing the pedestrian environment and providing bicycle parking. As discussed in detail in Section IV.F, Land Use and Appendix H, Land Use Tables, of this Draft EIR, the Project would not conflict with Hollywood Community Plan or Walkability Checklist policies related to encouraging pedestrian activity and reducing VMT. In addition, the Project would include a TDM Program consistent with LAMC Section 12.26J and as required by the Project's AB 900 application, as well as

⁹⁵ City of Los Angeles, *Vision Zero Safety Improvements*, <http://ladot.maps.arcgis.com/apps/View/index.html?appid=77df605a3eb142c7a0abc1c65bcf4861>, accessed January 31, 2020.

Mobility Hub support. The Project would also comply with all applicable LADOT design standards. **Therefore, the Project would not conflict with these programs, plans, ordinances, and policies.**

As discussed above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

(h) Vehicle Miles Traveled

The VMT Calculator was used to evaluate Project VMT and compare it to the VMT impact criteria. The VMT Calculator was set up with the Project's four land uses and their respective sizes as the primary input. Based on the Project's proposed land uses and location, the following assumptions were identified in the VMT Calculator:

- Total Population: 586
- Total Employees: 49
- APC: Central
- TBZ: Urban
- Maximum VMT Reduction: 75 percent

The VMT analysis results based on the VMT Calculator are summarized in Table IV.I-4 in Section IV.I, Transportation, of this Draft EIR. Detailed output from the VMT Calculator is provided in the VMT Memo included as Appendix O.2 of this Draft EIR. It should be noted that as part of the Project design, measures would be implemented to reduce the number of single occupancy vehicle trips to the Project Site. In addition, as previously discussed, pursuant to Project Design Feature TR-PDF-1, the Project would develop a TDM program prior to the issuance of a Certificate of Occupancy that would allow the Project to achieve the transportation efficiency required as part of its AB 900 certification. For purposes of this analysis, the following project design features were accounted for in the VMT evaluation:

- Reduced parking supply to provide less than the direct LAMC requirement without consideration of additional parking reduction mechanisms (i.e., Bicycle Parking Ordinance, Specific Plan or Enterprise Zone areas, etc.);
- Bicycle parking supply in accordance with the LAMC; and
- Pedestrian network improvements within the Project Site and connecting off-site.

As shown in Table IV.I-4 in Section IV.I, Transportation, of this Draft EIR, with application of the TDM strategies listed above, the VMT Calculator estimates that the Project would generate 3,200 total household VMT and 223 total work VMT. Thus, based on the population and employee assumptions above, the Project would generate an average household VMT per capita of 5.5 and an average work VMT per employee of 4.5. Both the household VMT per capita and the work VMT per employee for the Project would fall below the significance thresholds for the Central APC of 6.0 household VMT per capita and 7.6 work VMT per employee, which are 15 percent below the existing average household VMT per capita and 15 percent below the average work VMT per employee, respectively, for the APC in which the Project is located. **Therefore, the Project, without application of any TDM strategies, would not result in a significant VMT impact, and would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).**

(i) Hazardous Design Features

As evaluated in the Initial Study for the Project, which is included in Appendix A of this Draft EIR, the Project's design does not include hazardous features and the Project design would be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable safety requirements are met. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. In addition, the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by LAFD. The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the proposed uses would be similar to and consistent with the surrounding uses. **Therefore, no impact with respect to hazardous design features would occur, and no further analysis is required.**

(j) Emergency Access

Construction activities associated with the Project could potentially impact the provision of emergency services by the LAFD and the Los Angeles Police Department (LAPD) in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Pursuant to Project Design Feature TR-PDF-1, a Construction Traffic Management Plan would be prepared and submitted to LADOT for review and approval, and would require construction-related traffic to be scheduled outside of commuter peak hours to the extent feasible. Therefore, haul truck trips would occur outside of peak hours to the extent feasible and no peak-hour construction traffic impacts are expected during the excavation and grading phase of construction.

In addition, while traffic along surrounding roadways would increase with operation of the Project, the traffic generated by the Project would not result in any significant impacts on operating conditions of the intersections nearest the primary Project Site access. All Project driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the 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. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project. **Therefore, the Project would not result in inadequate emergency access, and, as such, impacts to emergency access would be less than significant.**

(13) Tribal Cultural Resources

In compliance with the requirements of AB 52, the City provided formal notification of the Project on February 7, 2017, to the tribes listed in Subsection IV.J.2.b.(3) of Section IV.J, Tribal Cultural Resources. The response period for the consultation requests concluded after 30 days on March 9, 2017. A record of this notification is included in Appendix B of the TCR Report.

As noted above, the City received a response from Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians—Kizh Nation, who stated the following:

Your project lies in an area where the Ancestral territories of the Kizh (Kitc) Gabrieleño's prominent villages adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods.... Our tribe is connected ancestrally to your project location area.

In addition, the Gabrieleño Band of Mission Indians—Kizh Nation requested that a monitor be present during all ground disturbing activities due to the Project Site's location within an area where "prominent villages adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods."

On March 8, 2017, the City replied to the Gabrieleño Band of Mission Indians—Kizh Nation, observing that it was unclear from their response how the Project would cause a substantial adverse impact on known tribal cultural resources. The City requested that the Gabrieleño Band of Mission Indians—Kizh Nation contact the City as soon as possible if formal consultation pursuant to AB 52 was desired.

To date, no response has been received from the Gabrieleño Band of Mission Indians—Kizh Nation or from any of the other tribal contacts regarding tribal cultural resources or other concerns about the Project. Based on the lack of response and

substantial evidence, government-to-government consultation initiated by the City, acting in good faith and after a reasonable effort, has not resulted in the identification of a tribal cultural resource within or near the Project Site. As such, with the close of tribal consultation, the City has fulfilled the requirements of AB 52. Documents related to AB 52 Consultation are included in the TCR Report.

The TCR Report includes a records search and literature review of 24 previous cultural resource studies that were conducted within the records search area, as discussed above. The results of this literature review did not identify any Native American resources within the records search area. In addition, as described above, the Project Site falls within the 0.5-mile radius of a previously completed, confidential SLF search. This search did not identify any recorded tribal cultural resources on the Project Site.

An appropriate approach to potential impacts to tribal cultural resources is developed in response to the identified presence of a tribal cultural resource by California Native American tribes through the process of consultation. Government-to-government consultation initiated by the City, acting in good faith and after a reasonable effort, has not resulted in the identification of a tribal cultural resource within or near the project area. No geographically defined tribal cultural resource was identified that might be impacted by the Project. CEQA only requires mitigation measures if substantial evidence exists of potentially significant impacts. CEQA Guidelines Section 15126.4(a)(4)(A) states that there must be an essential nexus between the mitigation measure and a legitimate government interest (i.e., potential significant impacts). **Therefore, based on these negative results, impacts to tribal cultural resources would be less than significant, and no mitigation measures are required.**

While no tribal cultural resources are anticipated to be affected by the Project, the City has established a standard condition of approval to address inadvertent discovery of tribal cultural resource. Should tribal cultural resources be inadvertently encountered, this condition of approval provides for temporarily halting construction activities near the encounter and notifying the City and Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project. If the City determines that the potential resource appears to be a tribal cultural resource (as defined by PRC Section 21074), the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The Project Applicant would then implement the tribe's recommendations if a qualified archaeologist reasonably concludes that the tribe's recommendations are reasonable and feasible. The recommendations would then be incorporated into a tribal cultural resources monitoring plan and once the plan is approved by the City, ground disturbance activities could resume. In accordance with the

condition of approval, all activities would be conducted in accordance with regulatory requirements.

Although the Project would result in less-than-significant impacts to tribal cultural resources, with implementation of the City's established condition of approval to address any inadvertent discovery of a tribal cultural resource, the less-than-significant impacts to tribal cultural resources would be further reduced.

(14) Utilities and Service Systems—Water Supply and Infrastructure

(a) Water Infrastructure

(i) Construction

As discussed on page 5 of the Utility Report included as Appendix F of this Draft EIR and as summarized below, with the inclusion of an additional fire hydrant, the existing LADWP water infrastructure would be adequate to provide for the water flow necessary to serve the Project during operation. Thus, no upgrades to the mainlines that serve the Project Site would be required. However, the Project would require new service connections to connect to the existing water mainlines adjacent to the Project Site, as well as potential relocation of existing lines. The design and installation of new service connections would be required to meet applicable City standards. Installation of the new water distribution lines would primarily involve on-site trenching to place the lines below the surface, and minor off-site work to connect to the existing public water mains. Coordination with LADWP would be required prior to ground disturbance in order to identify the locations and depth of all lines. In addition, LADWP would be notified in advance of proposed ground disturbance activities in order to avoid water lines and disruption of water service.

The limited off-site connection activities could also temporarily affect access in adjacent rights-of-way. However, as discussed in Section IV.I, Transportation, of this Draft EIR, a construction management plan would be implemented during Project construction pursuant to Project Design Feature TR-PDF-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. The construction management plan would identify the location of any temporary street parking or sidewalk closures, warning signs, and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way.

Overall, construction activities associated with the Project would not require or result in the construction of new water facilities or expansion of existing facilities that could have a significant impact on the environment. In addition, the existing water distribution capacity

would be adequate to serve the Project. **As such, construction-related impacts to water infrastructure would be less than significant.**

(ii) Operation

Water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. While domestic water demand is typically the main contributor to operational water consumption, the analysis provided herein conservatively assesses impacts on water supply infrastructure during a peak demand scenario. Since fire flow demands have a much greater instantaneous impact on infrastructure, they are the primary means for analyzing infrastructure capacity.

Fire flow to the proposed buildings of the Project would be required to meet City fire flow requirements. Specifically, the Project would comply with LAMC Section 57.507.3, which establishes fire flow standards by development type. The Project falls within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously with a residual pressure of 20 psi. However, as discussed further below, the LADWP has identified the need for additional fire flow at the Project Site. According to the Utility Report included as Appendix F to this Draft EIR, there are currently seven existing fire hydrants located near the Project Site. Two hydrants are located on the corner of Hollywood Boulevard and Wilcox Avenue, two hydrants are located at the corner of Hollywood Boulevard and Cahuenga Boulevard, two hydrants are located along at the corner of Selma Avenue and Wilcox Avenue, and one hydrant is located along Cahuenga Boulevard.

As part of the Utility Report included in Appendix F of this Draft EIR, an Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP in order to determine if the existing public infrastructure could meet the fire flow demands of the Project. Based on the IFFAR results (included in the Utility Report, Appendix F of this Draft EIR), the Project would require an eighth fire hydrant and a fire flow of 12,000 gpm at 20 psi in order to provide proper hydrant coverage. This proposed hydrant would be located along Wilcox Avenue, approximately 300 feet south of Hollywood Boulevard. In total, the eight fire hydrants would have the capacity to provide the required 12,000 gpm flowing simultaneously with a minimum residual pressure of 20 psi. Therefore, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for the Project. Furthermore, the Project would include the installation of automatic fire sprinklers, which would reduce or eliminate the public hydrant demands.

Based on the page 5 of the Utility Report, the Project would not exceed the available capacity of the existing water facilities including the water distribution infrastructure that would serve the Project Site. Although the fire flow demands of the Project would require the addition of another fire hydrant in the Project vicinity, this would not have an impact on

the existing water facilities since sufficient capacity is available in the main lines that serve the hydrants. **Therefore, the Project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant and no mitigation measures are required.**

(b) Water Supply

(i) Construction

Construction activities for the Project would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of the Project (from the start of construction to project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, 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 of the Project at buildout. Based on a review of the Project, MATT Construction, the Project's construction consultant, estimates the Project would generate demand for approximately 2,000 gallons of water per week (approximately 286 gpd) during construction,⁹⁶ which is less than the 2,372 gpd of existing estimated water consumption at the Project Site and substantially less than the 69,413 gpd of estimated proposed water consumption at the Project Site. Water for construction activities would be conveyed using the existing water infrastructure at the Project Site and no infrastructure improvements would be needed. Furthermore, as concluded on page ES-30 of LADWP's 2015 UWMP, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year in each year from 2015 through 2040. If approved, Project construction is anticipated to be completed in 2023. Therefore, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of Project construction. **As such, construction-related impacts to water supply would be less than significant.**

(ii) Operation

As described in Section II, Project Description, of this Draft EIR, upon build-out, the Project would include approximately 278,892 square feet of floor area comprised of 260 multi-family residential dwelling units, 11,020 square feet of retail uses, 3,580 square feet of office uses, and 3,200 square feet of restaurant uses. As discussed above, based

⁹⁶ *Personal communication with Tim Johnson of MATT Construction, October 11, 2017.*

on the size of proposed land uses and the Project's resulting estimated water demand, the Project is not subject to the requirements of SB 610 regarding preparation of a WSA.

Development of the Project would result in an increase in long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the sewage generation rates established by LASAN, which also serve to estimate water demand, to the proposed uses. Accordingly, as shown in Table IV.K.1-5 in Section IV.K.1 Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, it is estimated that the Project would result in a net increase in the Project Site's average daily water demand of approximately 69,453 gpd, or approximately 77.8 AFY (assuming constant water use throughout the year). However, it should be noted that this figure is highly conservative in that it assumes the pool would be drained and refilled on a daily basis which is unlikely to be the case because of standard practices and the Project's LEED® water reduction commitments. Refilling the pool would result in demand for approximately 34,408 gallons of water (38.5 AFY), which is included in the 69,453 gallons (77.8 AFY) discussed above. When the pool is not refilled, the Project would result in an average daily water demand of 37,417 gpd (41.9 AFY), or a net increase of 35,045 gpd (39.3 AFY) over existing conditions.

It should be noted that LASAN's wastewater generation factors do not account for water conservation features and therefore, the Project's estimated water demand discussed above is conservative. As discussed above, the City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9) requires newly constructed low-rise residential buildings to reduce indoor water use by at least 20 percent below baseline⁹⁷ by: (1) using water saving fixtures or flow restrictions; and/or (2) demonstrating a 20-percent reduction in baseline water use. Accordingly, the Project would incorporate sustainability features detailed in Project Design Feature WAT-PDF-1 such as efficient plumbing features, updated landscaping, modern irrigation, and efficient appliances that would reduce the Project's net increase in water demand by at least 35 percent below Los Angeles Green Building Code baselines, which exceeds the required 20-percent reduction. As part of the Project's AB 900 application (refer to Appendix B of this Draft EIR), a separate water use analysis was prepared which accounts for water conservation features and requirements. As demonstrated therein, with water conservation accounted for, the Project is anticipated to use approximately 21,940 gpd, which does not account for the existing uses that would be removed. However, for purposes of this analysis, the more conservative LADWP methodology is relied upon.

⁹⁷ *Baseline water use is calculated using Los Angeles Department of Building and Safety Worksheet WS-1.*

LADWP's 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City for normal, single-dry and multiple-dry years through the year 2040. Furthermore, as outlined in their 2015 UWMP, LADWP is committed to providing a reliable water supply for the City. LADWP's 2015 UWMP takes into account climate change and the concerns of drought and dry weather and notes that the City of Los Angeles will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. LADWP's 2015 UWMP also furthers the goals of the City's Executive Directive and Sustainable City pLAn. LADWP's 2015 UWMP also addresses the current and future SWP supply shortages and concludes that MWD's actions in response to the threats to the SWP would ensure continued reliability of its water deliveries. By focusing on demand reduction and alternative sources of water supplies, LADWP would further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages. Additionally, as described above, water conservation and recycling will play an increasing role in meeting future water demands in the City.

LADWP's 2015 UWMP utilized SCAG's RTP data that provide for comprehensive water demand forecasts, taking into account changes in population, housing units and employment.⁹⁸ As discussed in Section VI, Other CEQA Considerations, of this Draft EIR, the Project would generate approximately 630 new residents and 260 new households at Project buildout in 2023, and would be consistent with SCAG's 2016–2040 RTP/SCS growth projections for the City of Los Angeles Subregion.⁹⁹ Specifically, based on SCAG's projections for the City of Los Angeles Subregion between 2017 and 2023, the estimated 630 new residents generated by the Project would represent approximately 0.39 percent of the population growth of 190,975 persons between 2017 and 2023 and the 260 households would represent approximately 0.33 percent of the projected household growth of 91,200 households between 2017 and 2023.¹⁰⁰ Therefore, the Project would be well within SCAG's 2016–2040 projections for the City of Los Angeles Subregion.

⁹⁸ *The demand projections in LADWP's 2015 Urban Water Management Plan are based on demographic growth projections in SCAG's 2012–2035 RTP/SCS, the 2000 U.S. Census data and the 2010 U.S. Census data. Since preparation of LADWP's 2015 Urban Water Management Plan, new growth forecasts have become available in SCAG's 2016 RTP/SCS. However, the growth forecasts in SCAG's 2016 RTP/SCS are only marginally higher than the 2012–2035 RTP/SCS in terms of current (2016) estimates and future (2040) projections for the SCAG Region (i.e., 22,091,000 in 2035 under the 2012–2035 RTP/SCS vs. 22,138,000 in 2040 under the 2016–2040 RTP/SCS) and would, therefore, not significantly affect water demand projections.*

⁹⁹ *Based on the most recent estimated household size for multi-family housing units in the City of Los Angeles area of 2.42 persons per unit, the Project's proposed 260 residential units would generate approximately 630 persons.*

¹⁰⁰ *Based on a linear interpolation of SCAG's 2012–2020 and 2020–2035 data. See Table 11, Jurisdictional Growth Forecast in SCAG's 2016–2040 RTP/SCS Growth Forecast Appendix.*

(Footnote continued on next page)

Based on the above, the estimated water demand for the Project would not exceed the available supplies projected by 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. **Therefore, the Project's operation-related impacts on water supply would be less than significant.**

(15) Utilities and Service Systems—Wastewater

(a) Wastewater Infrastructure

(i) Construction

Temporary facilities, such as portable toilets and hand wash areas, would be provided during construction. Sewage from these facilities would be collected and hauled off-site and not discharged into the public sewer system. As such, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the IRP.

Project construction would, however, include the installation of new or relocated sewer line connections. These construction activities would be confined to trenching in order to place the sewer lines below surface. Such activities would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. In addition, activities related to the installation of any required wastewater infrastructure would be coordinated through LASAN, so as not to interrupt existing service to other users.

The 2017 and 2023 values for population and housing are calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to each year until 2017.

Population growth between 2017 (3,981,911 persons) and 2023 (4,145,604 persons) is approximately 163,693 persons. The Project's 630 new residents would represent approximately 0.58 percent of this growth $((630 \div 163,693) \times 100 = 0.39)$.

Household growth between 2017 (1,390,643 households) and 2023 (1,468,814 households) is approximately 78,171 households. The Project's 260 new households would represent approximately 0.5 percent of this growth $((260 \div 78,171) \times 100 = 0.33)$.

Based on the above, construction activities would not have any adverse impact on wastewater conveyance or treatment infrastructure. In addition, most construction impacts associated with the installation of on-site wastewater facilities and off-site connections are expected to be confined to trenching and would be temporary in nature and would not result in significant environmental effects.

As such, Project construction would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, construction impacts of the Project with respect to the wastewater treatment and infrastructure capacity would be less than significant, and mitigation measures would not be required.

(ii) Operation

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant. As described above, the Hyperion Water Reclamation Plant has a capacity of 450 mgd and current wastewater flow levels are at 275 mgd, resulting in available capacity of 175 mgd. As shown in Table IV.K.2-3 in Section IV.K.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project would generate a net increase wastewater flow from the Project Site of approximately 69,453 gpd, or approximately 0.07 mgd. The Project's increase in average daily wastewater flow of 0.07 mgd would represent approximately 0.04 percent of the current 175 mgd remaining available capacity of Hyperion Water Reclamation Plant. Therefore, the Project-generated wastewater would be accommodated by the existing capacity of the Hyperion Water Reclamation Plant and impacts with respect to treatment capacity would be less than significant.

Various factors, including future development of new treatment plants, upgrades and improvements to existing treatment capacity, development of new technologies, etc., will ultimately determine the available capacity of the Hyperion Service Area in 2023, the Project's buildout year. While it is anticipated that future iterations of the Integrated Resources Plan would provide for improvements to serve future population needs, it is conservatively assumed that no new improvements to the wastewater treatment plants would occur prior to 2023. Thus, based on this conservative assumption, the 2023 effective capacity of the Hyperion Service Area would continue to be approximately 550 million gallons per day. Similarly, the capacity of the Hyperion Water Reclamation Plant in 2023 will continue to be 450 mgd.

The Project's net increase in average daily wastewater generation of 0.07 mgd would represent approximately 0.013 percent of the Hyperion Service Area's assumed future capacity of 550 mgd and approximately 0.16 percent of the Hyperion Water

Reclamation Plant's design capacity of 450 mgd. In addition, the Project's net increase in average daily wastewater generation of 0.07 mgd plus the current flows of approximately 275 mgd to the Hyperion Water Reclamation Plant would represent approximately 61 percent of the Hyperion Water Reclamation Plant's estimated future capacity of 450 mgd. The Project's net increase in average daily wastewater generation of 0.07 mgd plus the current flows of approximately 338.2 mgd to the Hyperion Service Area would represent approximately 61.5 percent of the Hyperion Service Area's estimated future capacity of 550 million gallons per day. Thus, the Project's additional wastewater flows would not substantially or incrementally exceed the future scheduled capacity of any treatment plant. Impacts with respect to wastewater treatment capacity would be less than significant and no mitigation measures would be required.

Sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer lines in the vicinity of the Project Site, which includes the 8-inch sewer mains on Hollywood Boulevard and Wilcox Avenue. A SCAR would be obtained from LASAN to evaluate the capability of the existing wastewater system to serve the Project's estimated wastewater flow. Based on information provided by LASAN, the 8-inch sewer mains in Hollywood Boulevard and Wilcox Avenue adjacent to the Project Site do not currently have capacity to serve the Project due to high flows downstream of the Project Site at Sunset Boulevard and Wilcox Avenue. LASAN currently has plans to address the capacity issue through maintenance or pipe size upgrades in the sewer lines. If additional capacity is created, discharge into these lines would be viable. In the event additional capacity adjacent to the Project Site is not created, the feasibility of creating a 150-foot extension of sewer main from an existing 8-inch line west of the Project Site is currently being reviewed by LASAN. This line currently terminates west of Wilcox Avenue and flows west, bypassing the blockage at Sunset Boulevard and Wilcox Avenue. Under either scenario, further detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for the Project during the Project's permitting process. Regardless of where the connection is made, LASAN would serve the Project. All Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards.

As such, operation of the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects. Therefore, operational impacts of the Project with respect to wastewater treatment and infrastructure capacity would be less than significant, and mitigation measures are not required.

(b) Wastewater Treatment Capacity

As discussed above, construction and operation of the Project would not exceed wastewater treatment requirements of the LARWQCB. In addition, based on the temporary nature of construction of new on-site infrastructure and minor off-site work associated with connections to the public main line, as well as operational wastewater generation, the Project would not constrain existing and future scheduled wastewater treatment and infrastructure capacity. Furthermore, in order to issue permits, LASAN would have to confirm the local sewer system would be able to handle the increased flow from the Project, and the Project would comply with relevant design requirements as well as applicable sanitation and plumbing standards. As discussed above, two scenarios for the Project's wastewater discharge are currently being evaluated by LASAN, and it is expected that LASAN would make a determination that it has adequate treatment capacity to serve the Project's projected demand in addition to existing commitments. **Thus, with approval by LASAN, the Project would result in a determination by the wastewater treatment provider that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant and no mitigation measures are required.**

(16) Utilities and Service Systems—Energy Infrastructure

(a) Construction

(i) Electricity

Construction activities at the Project Site would require minor quantities of electricity for lighting, power tools and other support equipment. Heavy construction equipment would be powered with diesel fuel.

During Project construction activities, electricity usage represents 4 percent of the estimated net annual Project operational demand, which as described below, LADWP's existing electrical infrastructure currently has enough capacity to provide service for construction activities.¹⁰¹ As existing power lines are located in the vicinity of the Project Site, temporary power poles may be installed to provide electricity during Project construction. Moreover, construction electricity usage would replace the existing electricity usage at the Project Site during construction since the existing on-site uses which currently generate a demand for electricity would be removed. As existing power lines are located in the vicinity of the Project site, temporary power poles may be installed to provide electricity

¹⁰¹ The percentage is derived by taking the total amount of electricity usage during construction (48,730 kWh) and dividing that number by the total amount of net electricity usage during operation (1,289,062 kWh) to arrive at four percent.

during Project construction. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the Project during construction or demolition. Therefore, the Project would not result in an increase in demand for electricity 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.

With regard to existing electrical distribution lines, the Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. There are four existing utility poles within the site which do not appear to serve other neighbors. A quitclaim has been conditionally approved to remove these existing utility poles. As such, construction of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

(ii) Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction. Construction impacts associated with the installation of natural gas connections are expected to be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SoCalGas to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

(b) Operation

(i) Electricity

As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, the Project's operational electricity usage would be 1,289 MWh per year, which is less than 0.01 percent of LADWP's projected sales in 2023 (the Project's full buildout year). In addition, during peak conditions, the Project would represent approximately 0.006 percent of the LADWP estimated peak load. LADWP has confirmed that the Project's electricity demand can be

served by the facilities in the Project area.¹⁰² Therefore, during Project operations, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

(ii) Natural Gas

As shown in Table IV.C-2 in Section IV.C, Energy, of this Draft EIR, the Project would consume 2,837,146 cf of natural gas per year, which represents approximately 0.0003 percent of the 2023 forecasted consumption in the SoCalGas planning area. SoCalGas has confirmed that the Project's natural gas demand can be served by the facilities in the Project area.¹⁰³ Therefore, it is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's net increase in demand for natural gas.

(c) Conclusion

Construction and operation of the Project would not result in an increase in demand for electricity or natural gas 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. Therefore, Project impacts would be less than significant during construction and operation.

b. Less Than Significant with Mitigation

(1) Cultural Resources—Archaeological Resources

The results of the archaeological records search indicate that there are no identified archaeological resources within the Project Site and that two archaeological resources are located within a 0.5-mile radius of the Project Site. While these findings do not preclude the potential for an archaeological site to be identified during construction activities associated with the Project, encountering archaeological resources is unlikely since the Project Site has previously been graded as part of previous construction activities. However, the Project would require excavation to depths up to 40 feet below grade for construction of the subterranean parking levels, which is greater than previously excavated depths and would reach native soils. Therefore, it is possible that archaeological resources that were not identified during prior construction or other human

¹⁰² Psomas, 1624 Wilcox Avenue Project Utilities Technical Report. December 21, 2017. Refer to Appendix F of this Draft EIR.

¹⁰³ Psomas, 1624 Wilcox Avenue Project Utilities Technical Report. December 21, 2017. Refer to Appendix F of this Draft EIR.

activity may be present. As set forth in Mitigation Measure CUL-MM-1, a qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event archaeological materials are encountered, the archaeologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The implementation of Mitigation Measure CUL-MM-1 would ensure that any potential impacts related to archaeological resources would be less than significant. **Therefore, with implementation of Mitigation Measure CUL-MM-1, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5, and, as such, any potential impacts related to archaeological resources would be less than significant.**

(2) Geology and Soils—Paleontological Resources

A records search conducted for the Project Site indicates there are no previously encountered fossil vertebrate localities located within the Project Site. The closest identified localities from older Quaternary deposits in proximity to the Project Site are LACM 6297-6300, which were collected at depth between 47 and 80 feet below the surface to the east of the Project Site along Hollywood Boulevard between the Hollywood Freeway and Western Avenue. The fossil specimens included horse, *Equus*, bison, *Bison*, camel, *Camelops*, and mastodon, *Mammut americanum*. Furthermore, the closest identified locality recovered at shallow depth is LACM 5845, which produced a fossil specimen of mastodon, *Mammutidae*, at 5 to 6 feet below the surface and southeast of the Project Site. While the Project Site has been subject to grading and development in the past, excavation to construct the subterranean parking garage would extend to a depth of approximately 40 feet below grade. Thus, it is possible that paleontological artifacts that were not recovered during prior construction or other human activity may be present. As set forth in Mitigation Measure GEO-MM-1, a qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. In the event paleontological materials are encountered, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. **Therefore, implementation of Mitigation Measure GEO-MM-1 would ensure that any potential impacts related to paleontological resources would be less than significant.**

(3) Noise—On-Site Vibration (Building Damage)

With regard to potential building damage, the Project would generate ground-borne construction vibration during building demolition and site excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, would be used. The FTA has published standard vibration velocities for various construction equipment operations. Table IV.G-21 in Section IV.G, Noise, of this Draft EIR provides the

estimated vibration levels (in terms of inch per second PPV) at the nearest off-site structures to the Project Site. It is noted that since impact pile driving methods would not be used during construction of the Project, in accordance with Project Design Feature NOI-PDF-1 provided above, impact pile driving vibration is not included in the on-site construction vibration analysis. Installation of piles for shoring and foundation would utilize drilling methods to minimize vibration generation.

As discussed in Section IV.B. Cultural Resources, of the Draft EIR, the Attie Building is a historical resource and would remain as part of the Project. A significance criteria of 0.12 PPV is utilized for historic structures that are extremely susceptible to vibration damage. There are no other historic buildings or other structures extremely susceptible to vibration located in the close proximity (within 15 feet) of the Project construction site. The assessment of construction vibration provided below for potential building damage due to on-site construction compares the estimated vibration levels generated during construction of the Project to the 0.12-PPV significance criteria for buildings extremely susceptible to vibration (applicable to the Attie Building, a historic structure), the 0.2-PPV significance criteria for non-engineered timber and masonry building (applicable to the two-story buildings to the east and west of the Project Site), and the 0.3-PPV significance criteria for engineered concrete masonry building (applicable for the 3- and 4-story buildings to the south and north of the Project Site). In addition, the construction vibration analysis for potential building damage due to off-site construction activities (haul trips) conservatively compares the estimated vibration levels generated from haul truck activities to the 0.12-PPV significance criteria for buildings extremely susceptible to vibration damage.

As indicated in Table IV.G-21 in Section IV.G, Noise, of this Draft EIR, the estimated vibration velocity levels from construction equipment would exceed the 0.12 PPV building damage significance criteria at the Attie Building, the 0.2 PPV criteria at 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. **Therefore, vibration impacts during construction of the Project to off-site and on-site building structures would be significant. However, with implementation of Mitigation Measure NOI-MM-2, would ensure the vibration levels at the exterior of the Attie Building, the 2-story commercial building, and the 3-story hotel building adjacent to the Project Site would not exceed the significance criteria, 0.12 PPV for the Attie Building, 0.20 PPV for the 2-story commercial building, and 0.30 PPV for the 3-story hotel building. Therefore, vibration impacts associated with the on-site construction activities would be reduced to a less than significant level.**

c. Significant and Unavoidable

(1) Noise

(a) Project-Level On-Site Construction Noise

Noise impacts from Project-related construction activities occurring within or adjacent to the Project Site would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to noise-sensitive receptors. Construction activities for the Project would generally include demolition, site grading and excavation for the subterranean parking garage, and building construction. Each stage of construction would involve the use of various types of construction equipment and would, therefore, have its own distinct noise characteristics. Demolition generally involves the use of backhoes, front-end loaders, and heavy-duty trucks. Grading and excavation typically requires the use of earth-moving equipment, such as excavators, front-end loaders, and heavy-duty trucks. Building construction typically involves the use of cranes, forklifts, concrete trucks, pumps, and delivery trucks. Noise from construction equipment would generate both steady-state and episodic noise that could be heard within and adjacent to the Project Site.

Individual pieces of construction equipment anticipated to be used during construction of the Project could produce maximum noise levels (L_{max}) of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in Table IV.G-10 in Section IV.G, Noise, of this Draft EIR. These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites often operate under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction phase is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction phase.¹⁰⁴ These noise levels are typically associated with multiple pieces of equipment operating on part power, simultaneously.

Table IV.G-11 in Section IV.G, Noise, of this Draft EIR provides the estimated construction noise levels for various construction phases at the off-site noise-sensitive receptors. To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all pieces of construction equipment were assumed to operate simultaneously and be located at the construction area nearest to the affected

¹⁰⁴ Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2006, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

receptors. These assumptions represent the worst-case noise scenario because construction activities would typically be spread out throughout the Project Site, and, thus, some equipment would be farther away from the affected receptors. In addition, the noise modeling assumes that construction noise is constant, when, in fact, construction activities and associated noise levels are periodic and fluctuate based on the construction activities.

As discussed above, since construction activities would occur over a period longer than 10 days for all phases, the corresponding significance criteria used in the construction noise analysis is when the construction-related noise exceeds the ambient L_{eq} noise level of 5 dBA at a noise-sensitive use. As presented in Table IV.G-11 in Section IV.G, Noise, of this Draft EIR, construction activities would generate the highest noise during the demolition phase, as it is anticipated to have the highest noise generating construction equipment in the construction area compared to the Project's other construction stages. Therefore, the potential noise impacts (i.e., noise increase over the ambient level) would be highest during the demolition phase. As indicated in Table IV.G-11 in Section IV.G, Noise, of this Draft EIR, the estimated noise levels during all stages of Project construction would be below the significance criteria at off-site receptor locations R2, R4, R5, and R6. Without implementation of mitigation, the estimated noise levels at receptor locations R1 and R3 would exceed the 5-dBA significance criteria by up to 35.8 dBA and 5.0 dBA, respectively. Therefore, temporary noise impacts associated with the Project's on-site construction would be significant.

Implementation of Mitigation Measure NOI-MM-1 would reduce the Project's construction noise levels to the extent feasible. Specifically, implementation of Mitigation Measure NOI-MM-1 (installation of temporary sound barrier) would reduce the noise generated by on-site construction activities at the off-site sensitive uses, by minimum 15 dBA at the hotel use on Wilcox Avenue (receptor location R1) and by minimum 6 dBA at the hotel use on the Schrader Boulevard (receptor location R3). The estimated construction-related noise levels at off-site sensitive receptor locations R3 would be reduced to below a level of significance with implementation of Mitigation Measure NOI-MM-1. However, construction-related noise levels at receptor location R1 would still exceed the 5 dBA significance criteria above the ambient noise levels, by up to 21 dBA under worst-case conditions when construction equipment is operating adjacent to the building. A 15 dBA noise reduction is a substantial reduction for the type of temporary noise barrier used during construction. However, there are no other feasible mitigation measures that could be implemented to further reduce the temporary noise impacts. **Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable, even with implementation of mitigation.**

(b) *Project-Level On-Site Vibration (Human Annoyance)*

Table IV.G-22 in Section IV.G, Noise, of this Draft EIR provides the estimated vibration levels at the off-site sensitive uses due to construction equipment operation and compares the estimated vibration levels to the specified significance criteria for human annoyance. Per FTA guidance, the significance criteria for human annoyance is 72 VdB for sensitive uses, including residential and hotel uses, assuming there are a minimum of 70 vibration events occurring during a typical construction day. As indicated in Table IV.G-22, the estimated ground-borne vibration levels from construction equipment would be below the significance criteria for human annoyance at all off-site sensitive receptor locations, with the exception of receptor location R1, the hotel adjacent to the Project Site. The estimated ground-borne vibration levels at receptor location R1 would be up to 99 VdB and would exceed the 72 VdB significance criteria. Therefore, vibration impacts during construction of the Project to off-site receptors, pursuant to the significance criteria for human annoyance, would be significant.

Implementation of Mitigation Measure NOI-MM-2 would reduce the vibration impacts with respect to human annoyance at the Hotel use (receptor location R1). However, project-level vibration impacts from on-site construction activities would still exceed the 72-VdB significance criteria. Other mitigation measures considered to reduce vibration impacts from on-site construction activities with respect to human annoyance included the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered cost effective for temporary applications, such as construction.¹⁰⁵ In addition, constructing a wave barrier to reduce the Project's construction-related vibration impacts would, in and of itself, generate ground-borne vibration from the excavation equipment. Thus, it is concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance to a less-than-significant level. **Therefore, project-level vibration impacts from on-site construction activities with respect to human annoyance would remain significant and unavoidable.**

(c) *Project-Level Off-Site Vibration (Human Annoyance)*

Per FTA guidance, the significance criteria for human annoyance is 72 VdB for sensitive uses, including residential and hotel uses. Based on FTA data, typical buses and trucks would generate vibration levels of approximately 63 VdB at 50 feet from the

¹⁰⁵ Caltrans, *Transportation- and Construction-Induced Vibration Guidance Manual*, June 2004.

receptor.¹⁰⁶ The estimated vibration levels generated by construction trucks traveling along the anticipated haul route(s) were assumed to be within 20 feet of the sensitive uses along Highland Avenue, Cahuenga Boulevard, and Hollywood Boulevard. As indicated in the noise calculation worksheets included in Appendix I of this Draft EIR, the temporary vibration levels could reach approximately 75 VdB periodically as trucks pass sensitive receptors along the anticipated haul route(s). There are residential uses along Highland Avenue, Cahuenga Boulevard, and Hollywood Boulevard (between the Project Site and US-101), which would be exposed to ground-borne vibration above the 72-VdB significance criteria from the construction trucks. Therefore, potential vibration impacts with respect to human annoyance that would result from temporary and intermittent off-site vibration from construction trucks traveling along the anticipated haul route(s) would be significant.

In order to reduce this impact to a less than significant level, construction trucks would need to be a minimum of 25 feet from the sensitive receptors, which is not feasible, or an alternative haul route would be needed. No haul route between the Project Site and US-101 without similar sensitive receptors is available. Therefore, there are no feasible mitigation measures that would reduce the potential vibration human annoyance impacts. **Therefore, Project-level vibration impacts from off-site construction with respect to human annoyance would remain significant and unavoidable. Impacts would be temporary, intermittent, and limited to during daytime hours when the haul truck is traveling within 20 feet of a sensitive receptor.**

(d) Cumulative On-Site Construction Noise

As indicated in Section III, Environmental Setting, of this Draft EIR, 107 related projects have been identified in the vicinity of the Project Site. Noise from construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site, based on the *L.A. CEQA Thresholds Guide* screening criteria. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. While the majority of the related projects are located a substantial distance (greater than 1,000 feet) from the Project Site, the following 16 related projects are within 1,000 feet of the Project Site.

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 LAMC. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each

¹⁰⁶ FTA, "Transit Noise and Vibration Impact Assessment," May 2006, Figure 7-3.

individual related project and compliance with locally adopted and enforced noise ordinances. Based on the above, there would potentially be cumulative noise impacts at the nearby sensitive uses (e.g., residential and hotel uses) located in proximity to the Project Site and Related Project No. 75 and Related Project No. 92, in the event of concurrent construction activities. As such, cumulative noise impacts from on-site construction would be significant, and the Project's contribution would be cumulatively considerable.

Implementation of Mitigation Measure NOI-MM-1 provided above would reduce the cumulative construction noise levels to the extent feasible. However, there are no other feasible mitigation measures that could be implemented to further reduce the temporary noise impacts. **Therefore, cumulative construction noise impacts associated with on-site noise sources would remain significant and unavoidable, even with implementation of mitigation.**

(e) Cumulative Off-Site Construction Noise

In addition to the cumulative impacts of on-site construction activities, off-site construction haul trucks would have a potential to result in cumulative impacts if the trucks for the related projects and the Project were to utilize the same haul route. Specifically, based on the existing daytime ambient noise level of 70.9 dBA (L_{eq}) along the anticipated haul routes, including Highland Avenue, Cahuenga Boulevard and Hollywood Boulevard, it is estimated that up to 125 truck trips per hour could occur along Highland Avenue, Cahuenga Boulevard, and Hollywood Boulevard without exceeding the significance criteria of 5 dBA above ambient noise levels. Therefore, if the total number of trucks from the Project and related projects were to add up to 126 truck trips per hour along Highland Avenue, Cahuenga Boulevard, and Hollywood Boulevard, the estimated noise level from 126 truck trips per hour plus the ambient would be 75.9 dBA, which would exceed the ambient noise levels by 5 dBA and exceed the significance criteria.¹⁰⁷ While the Department of Building and Safety is trying to limit the number of projects using the same haul route to the extent feasible, there are several related projects in the vicinity of the Project Site, which could utilize the same haul route, such as, Related Project Nos. 17, 22, 55, 64, 67, 74, 75, 84, 92, 98, 102, and 105. Since the Project would generate up to 22 truck trips during peak construction period, it is conservatively assumed that truck traffic related to construction of the Project and other related projects would cumulatively add up to 126 or more hourly truck trips. Therefore, cumulative noise due to construction truck traffic from the Project and other related projects has the potential to exceed the ambient noise levels along the

¹⁰⁷ *It is estimated that with 125 truck trips, the cumulative noise level (74.1 dBA from construction traffic plus 70.9 dBA ambient) would be 75.8 dBA, which is 4.9 dBA above the ambient noise level of 70.9 dBA. With 126 truck trips, the cumulative noise level (74.2 dBA from construction traffic plus 70.9 dBA ambient) would be 75.9 dBA, which would exceed the ambient by 5.0 dBA.*

haul route by 5 dBA. As such, cumulative noise impacts from off-site construction would be 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. As discussed above, there are no feasible mitigation measures to reduce the temporary significant noise impacts associated with the cumulative off-site construction trucks. **As such, cumulative noise impacts from off-site construction would be significant and unavoidable.**

(f) Cumulative Off-Site Construction Vibration (Human Annoyance)

Based on FTA data, the vibration generated by a typical heavy truck would be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck.¹⁰⁸ In addition, according to the FTA “[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.” As discussed above, there are existing buildings that are approximately 20 feet from the right-of-way of the anticipated haul route(s) for the Project (i.e., Highland Avenue, Cahuenga Boulevard, and Hollywood Boulevard). These buildings are anticipated to be exposed to ground-borne vibration levels of approximately 0.022 PPV. Trucks from the related projects are expected to generate similar ground-borne vibration levels. Therefore, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul route(s) would be below the most stringent building damage significance criteria of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant.

As discussed above, potential vibration impacts associated with temporary and intermittent vibration from project-related construction trucks traveling along the anticipated haul route(s) would be significant with respect to human annoyance. 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(s). 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.

In order to reduce this impact to a less than significant level, construction trucks would need to be a minimum of 25 feet from the sensitive receptors, which is not feasible, or an alternative haul route would be needed. No haul route between the Project Site and

¹⁰⁸ FTA, “Transit Noise and Vibration Impact Assessment,” May 2006, Figure 7-3.

US-101 without similar sensitive receptors is available. Therefore, there are no feasible mitigation measures that would reduce the potential vibration human annoyance impacts. **Therefore, cumulative vibration impacts from off-site construction with respect to human annoyance would remain significant and unavoidable. Impacts would be temporary, intermittent, and limited to during daytime hours when the haul truck is traveling within 20 feet of a sensitive receptor.**

11. Project Design Features

The following project design features are applicable to the Project:

a. Air Quality

Project Design Feature AIR-PDF-1: Where power poles are available, electricity from power poles and/or solar powered generators rather than temporary diesel or gasoline generators shall be used during construction.

b. Greenhouse Gas Emissions

GHG-PDF-1: The design of the new building shall incorporate the following sustainability features:

- Optimize energy performance and reduce building energy cost by 22 percent for new/remodeled construction compared to the LEED® baseline of ASHRAE 90.1-2010.
 - Incorporate energy-saving technologies and components to reduce the Project's electrical use profile. Examples of these components include the use of light emitting diode (LED) and other efficient lighting technology, energy saving lighting control systems such as light- and motion-detection controls (where applicable), and energy efficient heating, ventilation, and air conditioning (HVAC) equipment.
 - HVAC mechanical systems and building lighting shall be controlled with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.
 - Demand control ventilation shall be utilized in HVAC systems, and refrigerants in HVAC equipment shall have low GHG emission rates. In particular, the HVAC system shall be designed to optimize exterior and interior air-flow to ensure healthy indoor air quality.

- Install occupancy-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption.
 - Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
 - Incorporate energy-efficient design methods and technologies such as a centralized chiller plant with rooftop ventilation, high performance window glazing, passive design and façade shading devices, high efficiency domestic water heaters, and enhanced insulation to minimize solar heat gain.
 - Built-in appliances, refrigerators, and space-conditioning equipment shall meet or exceed the minimum efficiency levels mandated in the California Code of Regulations, Title 24. High efficiency Energy Star-rated products and appliances shall be installed, as available.
 - Fenestration shall be designed for solar orientation (i.e., window systems shall be designed to reduce thermal gain and loss), thus reducing cooling loads during warm weather and heating loads during cool weather.
 - A large percentage of exterior walls shall be finished with light colored materials and high-emissivity characteristics to reduce cooling loads.
- Use of water-efficient plantings with drought-tolerant species.
 - Reduce outdoor water use by 30 percent below baseline requirements.
 - Reduce indoor water use by 35 percent below baseline requirements.
 - Conduct a performance check of the installed space-conditioning system prior to issuance of a Certificate of Occupancy to ensure that energy-efficiency measures incorporated into the Project operate as designed.
 - Complete post-construction commissioning of building energy systems prior to issuance of a Certificate of Occupancy.
 - Explore the feasibility of energy-saving variable frequency drive technology on domestic water pumps or ventilation fans, if applicable and necessary.
 - Allocate preferred parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.

GHG-PDF-2: Electric Vehicle Charging Stations The Project shall include at least twenty (20) percent of the total code required parking spaces provided for all types of parking facilities, but in no case less than one location,

shall be capable of supporting future electric vehicle supply equipment (EVSE). Plans shall indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design shall be based upon Level 2 or greater EVSE at its maximum operating ampacity. Of the 20 percent EV Ready, ten (10) of the total code required parking spaces shall be further provided with EV chargers to immediately accommodate electric vehicles within the parking areas. When the application of either the 20 percent or 10 percent results in a fractional space, round up to the next whole number. A label stating “EVCAPABLE” shall be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point.

GHG-PDF-3: The Project will provide a minimum of 105 kilowatts of photovoltaic panels on the Project Site.

GHG-PDF-4: The residential units within the Project will not include the use of natural gas fueled fireplaces.

c. Noise

Project Design Feature NOI-PDF-1: Project construction shall not include the use of driven (impact) pile systems.

Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment shall be enclosed or screened from off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-3: Outdoor amplified sound systems, if any, shall be designed so as not to exceed the maximum noise level of 75 dBA (L_{eq-1hr}) at a distance of 25 feet from the amplified speaker sound systems at the Ground Level (courtyards), 85 dBA (L_{eq-1hr}) at the Level 4 (pool deck and courtyard), and 95 dBA (L_{eq-1hr}) at Level 12 (sky deck). A qualified noise consultant shall provide written documentation that the design of the system complies with these maximum noise levels.

d. Public Services—Fire Protection

Project Design Feature FIR-PDF-1: Automatic fire sprinkler systems shall be installed in all new non-high-rise buildings.

e. Public Services—Police Protection

- Project Design Feature POL-PDF-1:** During construction, the Applicant shall implement temporary security measures including security fencing, lighting, and locked entry.
- Project Design Feature POL-PDF-2:** The Project shall include a closed circuit camera system and keycard entry for the residential building and the residential parking areas
- Project Design Feature POL-PDF-3:** The Project shall provide proper lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.
- Project Design Feature POL-PDF-4:** The Project shall provide sufficient lighting of parking areas to maximize visibility and reduce areas of concealment.
- Project Design Feature POL-PDF-5:** The Project shall design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.
- Project Design Feature POL-PDF-6:** Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant shall submit a diagram of the Project Site to the LAPD's Hollywood Service Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

f. Transportation

- TR-PDF-1:** Prior to the start of construction, the Project Applicant will prepare a Construction Traffic Management Plan and submit it to LADOT for review and approval. The Construction Traffic Management Plan will include a Worksite Traffic Control Plan, which will facilitate traffic and pedestrian movement, and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan will include, but not be limited to, the following measures:
- Maintaining access for land uses in the vicinity of the Project Site during construction;
 - Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Wilcox Avenue, to ensure traffic safety on public rights-of-way;
 - Schedule construction material deliveries during off-peak periods to the extent practical;

- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Control truck and vehicle access to the Project Site with flagmen;
- Limit sidewalk and lane closures to the maximum extent possible, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan will identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity; and/or
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

TR-PDF-2: The Project shall prepare and implement a Transportation Demand Management (TDM) Program to reduce peak hour vehicular traffic to and from the Project Site by 15 percent. The TDM would promote non-automobile travel and reduce the use of single-occupant vehicle trips with a comprehensive program of design features, transportation services, education programs, and incentive programs. These strategies can include, but are not necessarily limited to, the following:

- Transportation Information Center, educational programs, kiosks, and/or other measures;
- Promotion and support of carpools and rideshare;
- Bicycle amenities such as racks;
- Parking incentives and support for formation of carpools/vanpools;
- On-site TDM coordinator;
- Mobility hub support;
- Contribution to the City's Bicycle Trust Fund for implementation of bicycle improvements in the Project area; and
- Participation as a member in the future Hollywood Community Transportation Management Organization (TMO), when operational.

TR-PDF-3: The Project would contribute up to \$270,000.00 toward Transportation Systems Management (TSM) improvements within the Hollywood-Wilshire District that may be considered to better accommodate intersection operations and increase intersection capacity throughout

the Study Area. LADOT has determined that a 1 percent improvement in V/C ratio could be applied to the intersections along the targeted corridor to account for the TSM improvements. The TSM improvements would target the Cahuenga Boulevard and Franklin Avenue corridors. Potential TSM improvements include the installation of new conduits and interconnect/fiber optic cables to improve network capacity to better utilize adaptive traffic signal control, additional closed circuit television cameras to real-time monitoring of intersection, corridor, transit, and pedestrian operations within the Hollywood area. The installation of new conduits and interconnect/fiber optic cables to improve network capacity to better utilize adaptive traffic signal control, additional closed circuit television cameras to real-time monitoring of intersection, corridor, transit, and pedestrian operations within the Hollywood area.

g. Utilities and Service Systems—Water Supply and Infrastructure

Project Design Feature WAT-PDF-1: The Project design shall incorporate the following water conservation features to support water conservation in addition to those measures required by the City's current codes and ordinances:

- Reduce indoor water use by a minimum of 35-percent and outdoor water use by 30-percent below Los Angeles Green Building Code baselines by installing water fixtures and appliances that exceed applicable standards:
 - Residential showerheads with a maximum flow rate of 1.75 gallons per minute.
 - Residential lavatory faucets with a maximum flow rate of 1 gallon per minute.
 - Residential kitchen faucets with a maximum flow rate of 1.5 gallons per minute.
 - High efficiency toilets with a maximum flow rate of 1 gallon per flush.
 - Use of high-efficiency Energy Star-rated dishwashers where appropriate.
 - Nonresidential lavatory faucets with a maximum flow rate of 0.5 gallon per minute.
 - Nonresidential toilets with a maximum flow rate of 1.1 gallons per minute.
 - Nonresidential urinals with a maximum flow rate of 0.125 gallon per minute.

- Individual metering and billing for water use of all residential uses and exploration of such metering for commercial spaces.
- Use of proper hydro-zoning, turf minimization, zoned irrigation and use of native/drought-tolerant plant materials.
- Use of landscape contouring to minimize precipitation runoff.

12. Mitigation Measures

The following mitigation measures are applicable to the Project:

a. Cultural Resources—Archeological Resources

Mitigation Measure CUL-MM-1: A qualified archaeologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the archaeologist and the City of Los Angeles Department of City Planning and shall depend on the rate of excavation and grading activities and the materials being excavated. If archaeological materials are encountered, the archaeologist shall temporarily divert or 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. The Applicant shall then comply with the recommendations of the evaluating archaeologist, and a copy of the archaeological survey report shall be submitted to the Department of City Planning. Ground-disturbing activities may resume once the archaeologist's recommendations have been implemented to the satisfaction of the archaeologist.

b. Geology and Soils—Paleontological Resources

Mitigation Measure GEO-MM-1: The Project Applicant or its successor shall retain a qualified paleontologist to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. 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. The Project Applicant or its successor

shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

c. Noise

Mitigation Measure NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the southern property line of the Project Site between the construction areas and the hotel building directly south of the Project Site (receptor R1). The temporary sound barrier (minimum sound transmission class 25) shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor R1.
- Along the western property line of the Project Site between the construction areas and hotel west of the Project Site (receptor R3). The temporary sound barrier shall be designed to provide a minimum 6-dBA noise reduction at the ground level of receptor R3.

Mitigation Measure NOI-MM-2: Prior to start of construction, the Applicant shall retain the services of a structural engineer or qualified professional to visit the Attie Building, the 2-story commercial building on Hollywood Boulevard (adjacent to the Project Site to the east), and the 3-story hotel building on Wilcox Avenue (adjacent to the Project Site to the south) to inspect and document the apparent physical condition of the buildings' readily-visible features. In addition, the structural engineer shall establish baseline structural conditions of the building and prepare a shoring design.

Prior to start of construction, the Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring program capable of documenting the construction-related ground vibration levels at the Attie Building, the 2-story commercial building, and the 3-story hotel building during demolition, grading/excavation, and construction of the subterranean parking garage. The vibration monitoring system shall continuously measure and store the peak particle velocity (PPV) in inch/second. The system shall also be programmed for two preset velocity levels: a warning level of

0.10 PPV for the Attie Building, 0.16 PPV for the 2-story commercial building and 0.25 PPV for the 3-story hotel building and a regulatory level of 0.12 PPV for the Attie Building, 0.20 PPV for the 2-story commercial building, and 0.30 PPV for the 3-story hotel building. The system shall also provide real-time alert when the vibration levels exceed the two preset levels.

In the event the warning level (0.10 PPV for the Attie Building, 0.16 PPV for the 2-story commercial building, and 0.25 PPV for the 3-story hotel building) is triggered, the contractor shall identify the source of vibration generation, halt construction in the immediate vicinity, and provide feasible steps to reduce the vibration level, including but not limited to halting/staggering concurrent activities and utilizing lower vibratory techniques.

In the event the regulatory level (0.12 PPV for the Attie Building, 0.20 PPV for the 2-story commercial building, and 0.30 PPV for the 3-story hotel building) is triggered, the contractor shall halt the construction activities in the vicinity of the building and visually inspect the building for any damage. Results of the inspection must be logged and maintained by the contractor and submitted to the Los Angeles Department of Building and Safety. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart.

In the event damage occurs to historic finish materials (applicable to the Attie Building) due to construction vibration, such materials shall be repaired in consultation with a qualified preservation consultant and, if warranted, in a manner that meets the Secretary of the Interior's Standards.

13. Summary of Alternatives

This Draft EIR examines five alternatives to the Project in detail, which include the No Project/No Build Alternative; Zoning Compliant Mixed-Use Alternative; Zoning Compliant Office Alternative; Zoning Compliant Hotel Alternative, and Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives and a comparative analysis of the impacts of these alternatives relative to those of the Project.

a. Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in

part that, “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. The Project Site is currently occupied by four low-rise commercial buildings that comprise a total of 29,200 square feet of floor area as well as surface parking. Included in this floor area is the 9,000-square-foot Attie Building located at the corner of Hollywood Boulevard and Wilcox Avenue, which is a contributing structure to the Hollywood Boulevard Commercial and Entertainment District.¹⁰⁹ No new construction would occur.

b. Alternative 2: Zoning Compliant Mixed-Use Alternative

Under this Alternative, the Project Site would be developed in accordance with the existing C4-2D-SN (Commercial, Height District 2 with Development Limitation) zoning for the Project Site which permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters, as well as multi-family residential uses in conjunction with the Regional Center Commercial land use designation. Under existing zoning, no height limit applies to the Project Site. Like the Project, this alternative would include residential and neighborhood-serving commercial uses. However, in accordance with the Development Limitation, development would be subject to a FAR limitation of 2.0:1. Thus, Alternative 2 would develop a total of approximately 123,952 square feet of uses on the Project Site compared to the Project’s 278,892 square feet of uses. Alternative 2 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. The proposed uses would be comprised of approximately 125 multi-family residential units (compared to the Project’s 260 units, up to 10 percent of which would be workforce housing¹¹⁰), 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses (compared to 11,020 square feet of retail uses, 3,580 square feet of office uses, and 3,200 square feet of restaurant uses with the Project). These uses would be located in the Attie Building and new buildings between one and eight stories with a maximum height of 90 feet, which is less than the maximum height of 160 feet with the Project. Unlike the Project, which includes workforce housing,

¹⁰⁹ *The Hollywood Boulevard Commercial and Entertainment District is a 12 block area of the commercial core of Hollywood that contains examples of architecture from the 1920s and 1930s. The district includes 63 contributing properties and was listed in the National Register of Historic Places in 1984. Source: Hollywood Heritage, Inc., “Policies and Procedures,” www.hollywoodheritage.org/policies-and-procedures, accessed January 7, 2020, and National Park Service, “National Register of Historic Places Inventory—Nomination Form,” March 6, 1985.*

¹¹⁰ *Per the Los Angeles Housing and Community Investment Department, the qualifying maximum income level for workforce housing is 150 percent of the area median income based on family size.*

all of the residential units would be market rate. The Zoning Compliant Mixed-Use Alternative would provide approximately 15,238 square feet of open space. Alternative 2 would include 222 parking spaces located in 0.5 ground level and two above-grade parking levels, which is less than the 420 parking spaces provided by the Project. The Zoning Compliant Mixed-Use Alternative would also include 125 long-term and 13 short-term bicycle parking spaces located on Level 1. Unlike the Project, the vehicular parking provided does not account for a permitted 10-percent reduction, pursuant to the Los Angeles Bicycle Parking Ordinance (LAMC Section 12.21-A,4). Vehicular access to the Project Site would be provided via a new driveway on Wilcox Avenue, similar to the Project. Pedestrian access would be provided via the sidewalks along Hollywood Boulevard and Wilcox Avenue. With reduced density and square footage, the overall length and intensity of construction would be less than that of the Project. Construction of Alternative 2 would require less excavation and grading since no subterranean parking levels would be constructed and total floor area would be reduced by 154,940 square feet. Accordingly, the overall total amount of construction activities and duration under Alternative 2 would be less than that of the Project. Additionally, unlike the Project, Alternative 2 would not seek certification under AB 900, the *Jobs and Economic Improvement through Environmental Leadership Act*.

c. Alternative 3: Zoning Compliant Office Alternative

Under this Alternative, the Project Site would be developed in accordance with the existing C4-2D-SN (Commercial, Height District 2 with Development Limitation) zoning for the Project Site, which permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. Under the existing zoning, no height limit applies to the Project Site. In addition, in accordance with the Development Limitation, development would be subject to a FAR limitation of 2.0:1. Alternative 3 would replace the residential uses proposed by the Project with office uses but would still include retail and restaurant uses. Thus, under the existing zoning and the uses currently permitted on the Project Site, Alternative 3 proposes the development of approximately 106,152 square feet of office uses, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses in the Attie Building and new buildings up to 11 stories and a maximum height of 140 feet, which is less than the Project's maximum height of 160 feet. Alternative 3 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. The Zoning Compliant All Office Alternative would include 246 parking spaces located in one ground level and two above grade parking levels. Alternative 3 would also include 31 long-term and 20 short-term bicycle parking spaces located on Level 1. Unlike the Project, the vehicular parking provided does not account for a permitted 10-percent reduction, pursuant to the Los Angeles Bicycle Parking Ordinance (LAMC Section 12.21-A,4). Vehicular access to the Project Site would be provided via a new driveway on Wilcox Avenue, similar to the Project. Pedestrian access would be provided via the sidewalks along Hollywood Boulevard and Wilcox Avenue.

Architectural elements, lighting, and signage would be similar to that of the Project. Construction of Alternative 3 would require less excavation and grading compared to the Project since no subterranean parking levels would be constructed and total floor area would be reduced by 154,940 square feet. Accordingly, the overall total amount of construction activities and duration under Alternative 3 would be less than that of the Project. Additionally, unlike the Project, Alternative 3 would not seek certification under AB 900, the *Jobs and Economic Improvement through Environmental Leadership Act*.

d. Alternative 4: Zoning Compliant Hotel Alternative

Under this Alternative, the Project Site would be developed in accordance with the existing C4-2D-SN (Commercial, Height District 2 with Development Limitation) zoning for the Project Site, which permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. Under existing zoning, no height limit applies to the Project Site. In accordance with the Development Limitation, development would be subject to a FAR limitation of 2.0:1. Alternative 4 would replace the residential uses proposed by the Project with hotel uses but would still include retail and restaurant uses. Thus, Alternative 4 would develop an approximately 106,152 square foot hotel that would include 197 rooms, 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. Alternative 4 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. The proposed uses would be located in the Attie Building and new buildings up to 11 stories and a maximum height of 130 feet, which is less than the Project's maximum height of 160 feet. The Zoning Compliant Hotel Alternative would include 124 parking spaces located in one ground level and one above-grade parking level. The Zoning Compliant Hotel Alternative would also include 19 long-term and 19 short-term bicycle parking spaces located on Level 1. Unlike the Project, the vehicular parking provided does not account for a permitted 10-percent reduction, pursuant to the Los Angeles Bicycle Parking Ordinance (LAMC Section 12.21-A,4). Vehicular access to the Project Site, including a pick-up/drop-off area, would be provided via a new driveway on Wilcox Avenue, similar to the Project. Pedestrian access would be provided via the sidewalks along Hollywood Boulevard and Wilcox Avenue. Architectural elements, lighting, and signage would be similar to that of the Project. Construction of Alternative 4 would require less excavation and grading compared to the Project since no subterranean parking levels would be constructed and total floor area would be reduced by 154,940 square feet. Accordingly, the overall total amount of construction activities and duration under Alternative 4 would be less than that of the Project. Additionally, unlike the Project, Alternative 4 would not seek certification under AB 900, the *Jobs and Economic Improvement through Environmental Leadership Act*.

e. Alternative 5: Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative

Under the proposed Community Plan Update the Project Site would be designated as a Regional Center Commercial with a corresponding zone of C4-2D-CPIO. This designation/zone would provide for a FAR limitation of 3:1 with a height limit of 75 feet. With a maximum FAR of 3:1, a total of approximately 127,375 square feet of new uses would be developed consisting of 124 multi-family dwelling units (109,575 square feet), 14,600 square feet of retail uses, and 3,200 square feet of restaurant uses. The total floor area would be reduced by 151,517 square feet compared to the Project. Alternative 5 would retain the Attie Building on-site for continued use as commercial space, but unlike the Project, the building would not be rehabilitated and restored. These uses would be located in the Attie Building and new buildings comprised of between one and seven stories with a maximum height of 75 feet, which is less than the Project's maximum height of 160 feet. Unlike the Project, which includes workforce housing, all residential units would be market rate. The Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative would provide approximately 14,375 square feet of open space. Alternative 5 would include 222 parking spaces located in one subterranean parking level, one partial ground level, and one level of above-grade parking, which is less than the 420 parking spaces provided in two subterranean, one ground level, and two levels of above-grade parking included in the Project. The Proposed Hollywood Community Plan Update Compliant Mixed-Use Alternative would also include 124 long-term and 13 short-term bicycle parking spaces located on Level 1. Unlike the Project, the vehicular parking provided does not account for a permitted 10-percent reduction, pursuant to the Los Angeles Bicycle Parking Ordinance (LAMC Section 12.21-A,4). Vehicular access to the Project Site would be provided via a new driveway on Wilcox Avenue, similar to the Project. Pedestrian access would be provided via the sidewalks along Hollywood Boulevard and Wilcox Avenue. Additionally, unlike the Project, Alternative 5 would not seek certification under AB 900, the *Jobs and Economic Improvement through Environmental Leadership Act*.

f. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, the No

Project/No Build Alternative; Alternative 2, the Zoning Compliant Mixed-Use Alternative; Alternative 3, the Zoning Compliant Office Alternative; Alternative 4, the Zoning Compliant Hotel Alternative; and Alternative 5, the Proposed Hollywood Community Plan Update Compliant Alternative. Table V-1 in Section V, Alternatives, of this Draft EIR provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project’s significant environmental impacts, including the Project’s significant and unavoidable impacts related to on-site noise during construction, on-site vibration during construction (pursuant to the threshold for human annoyance), and off-site vibration (pursuant to the threshold for human annoyance) during construction. In addition, Alternative 1 would avoid the Project’s significant cumulative noise impacts from off-site haul trucks. However, the No Project/No Build Alternative would not meet any of the Project objectives or achieve the Project’s underlying purpose to revitalize the Project Site by developing an integrated mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail, office, and restaurant uses that serve the community and promote walkability while also rehabilitating the Attie Building.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative (Alternative 1—No Project/No Build Alternative), a comparative evaluation of the remaining alternatives indicates that Alternative 5, the Proposed Hollywood Community Plan Update Compliant Alternative, would be the Environmentally Superior Alternative. As discussed above, Alternative 5 would not avoid the Project’s significant and unavoidable environmental impacts related to noise and vibration during construction. However, Alternative 5 would reduce many of the Project’s less-than-significant impacts. In addition, unlike Alternative 3, Alternative 5 would not result in significant and unavoidable impacts with respect to traffic that cannot be mitigated. Alternative 5 would not include many of the beneficial aspects of the Project however, including the installation of solar panels, reduction of indoor and outdoor water use above code requirements, and other measures proposed by the Project to achieve LEED® Gold Certification. Alternative 5 would also not provide the same reduction in VMT as the Project because it would not include a TDM Program to reduce vehicle trips by 15 percent like the Project.

However, Alternative 5 would only partially achieve the Project’s underlying purpose of revitalizing the Project Site by developing an integrated mixed-use development that provides new multi-family housing opportunities and neighborhood-serving retail, office, and restaurant uses that serve the community and promote walkability while also

rehabilitating the Attie Building. Specifically, Alternative 5 would provide fewer residential units than the Project and no office uses, and the Attie Building would not be rehabilitated and restored. Additionally, as all the residential units would be market rate, Alternative 5 would not meet the following Project objectives pertaining to restoration of the Attie Building or workforce housing:¹¹¹

- Rehabilitate the historic Attie Building and preserve its use as commercial space.
- Provide workforce housing to help meet the City's housing goals.
- Promote community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through workforce housing.

Alternative 5 would also not meet the following objectives to the same extent as the Project:

- Create a high density, mixed-use development at a location served by public transit and locate residential uses in in a transit priority area;
- Redevelop and improve the visual character of the Project Site with a high density residential, office, and commercial infill development;
- Provide housing near public transit by constructing new residential dwelling units with varying mixes of number of-bedrooms, in an infill location close to commercial and office uses.
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

Alternative 5 would satisfy only one objective to the same extent as the Project:

- Create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street-adjacent uses such as neighborhood-serving commercial uses.

¹¹¹ *While not a specific objective of the Project, by providing fewer residential units and no workforce housing, Alternative 5 would not assist the City in meeting its RHNA allocation to the same extent of the Project. Specifically, the 124 residential units included in Alternative 5 would represent 0.15 percent of the City's RHNA allocation. By comparison, the 260 residential units proposed by the Project would represent 0.32 percent of the City's RHNA allocation.*