

APPENDIX C

Senate Bill 375 Memorandum



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technical memorandum

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to City of Los Angeles, Department of City Planning

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subject Eligibility of the Hollywood Center Project for CEQA Streamlining under Public Resources Code Section 21159.28

Introduction

The Hollywood Center Project would construct four new residential buildings (two on the West Site and two on the East Site) around the existing Capitol Records Complex on the 4.46-acre Project Site in the Hollywood Community Plan Area of the City of Los Angeles, with two buildout options, the Project and the Project with the East Site Hotel Option. The Project would include 1,005 residential dwelling units (872 market-rate units and 133 senior affordable housing units); the proposed Project with the East Site Hotel Option would include 884 residential dwelling units (768 market-rate units and 116 senior affordable housing units) and a 220-room hotel. Under both Project buildout options, the Project would preserve the Capitol Records Complex (other than the potential reconfiguration of a portion of the existing supporting parking), and remove the remaining existing uses. This Technical Memorandum was prepared to evaluate the eligibility of the Hollywood Center Project to qualify for California Environmental Quality Act (CEQA) streamlining pursuant to Public Resources Code §21159.28. The analysis presented below consists of the following four sections: (1) Background; (2) Public Resources Code §21159.28 CEQA Streamlining Criteria; (3) Analysis of Project Eligibility for Public Resources Code §21159.28 CEQA Streamlining; and (4) Conclusion.

Background

Senate Bill (SB) 375 (Chapter 728, Statutes of 2008) was adopted by the State on September 30, 2008, and established mechanisms for the development of regional targets for reducing passenger vehicle greenhouse gas (GHG) emissions. SB 375 also added §21159.28 to the Public Resources Code, which provides that residential and mixed-use projects that meet certain criteria are eligible for CEQA streamlining, provided that the California Air Resources Board (CARB) has accepted the Metropolitan Planning Organization's (MPO) determination that the project area's Sustainable Communities Strategy (SCS) achieves the GHG emission reduction targets established by CARB for the region.

Under SB 375, CARB is required, in consultation with the state's MPOs, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. In February 2011, CARB adopted the final

GHG emissions reduction targets for the Southern California Association of Governments (SCAG), which is the MPO for the region in which the City of Los Angeles is located.¹ The target includes a per capita reduction of 8 percent for 2020 and 13 percent for 2035 compared to the 2005 baseline.² Of note, the proposed reduction targets explicitly exclude emission reductions expected from the vehicle tailpipe emissions standards (i.e., passenger vehicle and light-duty truck Pavley standards under Assembly Bill [AB] 1493) and the low carbon fuel standard regulations. SB 375 requires that the reduction target must be incorporated within that region's Regional Transportation Plan (RTP), which is used for long-term transportation planning, in an SCS.

On April 7, 2016, SCAG adopted the 2016 RTP/SCS. Using growth forecasts and economic trends, the 2016 RTP/SCS provides a vision for transportation throughout the region for the next 25 years. The 2016 RTP/SCS demonstrates that it would achieve and exceed the applicable GHG emission-reduction targets set by CARB with an 8 percent reduction by 2020, 18 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level on a per capita basis.³ CARB has accepted the SCAG GHG quantification determination in the 2016 RTP/SCS and that the 2016 RTP/SCS, if implemented, would achieve the applicable 2020 and 2035 GHG emission reduction targets established by CARB.⁴

CEQA Streamlining Criteria in Public Resources Code §21159.28

Public Resources Code §21159.28 establishes the following eligibility criteria for CEQA streamlining:

- The project must be either a residential or mixed-use residential project where at least 75 percent of the total building square footage of the project consists of residential use, or a project that is a Transit Priority Project (TPP) as defined in §21155.
- The project must be consistent with the use designation, density, building intensity, and applicable policies specified for the project area in a CARB-accepted SCS.
- The project must incorporate the mitigation measures required by an applicable prior environmental document. In the case of the SCAG 2016 RTP/SCS, the applicable environmental document is the Program Environmental Impact Report (PEIR) that was prepared for the plan. The 1988 Hollywood Community Plan is in effect for the Hollywood Community Plan Area in which the Project Site is located. However, the 1988 Hollywood Community Plan does not contain mitigation measures applicable to the Project.

In cases where all of the criteria are met, Public Resources Code §21159.28 states that no environmental analysis is required of: (1) project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network; (2) growth-inducing impacts; and (3) a reduced residential density alternative that addresses the effects of car and light-duty truck trips generated by the project.

¹ California Air Resources Board, Sustainable Communities, <https://ww2.arb.ca.gov/our-work/topics/sustainable-communities>. Accessed March 2020.

² In March 2018, the CARB updated the SB 375 targets to require 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions. As this reduction target was updated after the 2016-2040 RTP/SCS, it is expected that the next iteration of the RTP/SCS will be updated to include this target.

³ Southern California Association of Governments, 2016 RTP/SCS, <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. Accessed March 2020.

⁴ California Air Resources Board, Southern California Association of Governments' (SCAG) 2016 Sustainable Communities Strategy (SCS) ARB Acceptance of GHG Quantification Determination, June 2016, https://ww3.arb.ca.gov/cc/sb375/scag_executive_order_g_16_066.pdf. Accessed March 2020.

Analysis of Project Eligibility for CEQA Streamlining in Public Resources Code §21159.28

1. Residential or Mixed-use Residential Project OR Transit Priority Project

The Hollywood Center Project would construct four new residential buildings (two on the West Site and two on the East Site) around the existing Capitol Records Complex on the 4.46-acre Project Site in the Hollywood Community Plan Area of the City of Los Angeles, with two buildout options: the Project and the Project with the East Site Hotel Option. Under the Project, four new buildings are proposed, including a 35-story “West Building,” a 46-story “East Building,” and two 11-story senior buildings set aside for Extremely Low and/or Very Low Income households with one senior building on each site (the “West Senior Building” and the “East Senior Building”). The Project would develop approximately 1,287,150 square feet of developed floor area, including 1,005 residential dwelling units (872 market-rate units and 133 senior affordable housing units) totaling approximately 1,256,974 square feet of residential floor area, approximately 30,176 square feet of commercial floor area (retail and restaurant uses), and including the existing 114,303 square foot Capitol Records Complex (consisting of the 92,664 square-foot Capitol Records Building and the 21,639 square-foot Gogerty Building), for a total buildable area of 1,401,453 square feet. In addition, the Project option would also contain 166,582 square feet of open space and amenities, including a Paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events. The Project would have a floor area ratio of 6.975 and provide a net residential density of approximately 225 dwelling units per acre pre-dedication and 218 dwelling units per acre post-dedication.⁵ Thus, the Project under the Project Option would consist of building floor area that would be considered approximately 90 percent residential building floor area⁶ and the Project would meet the criteria of at least 75 percent of the total building square footage consisting of residential use.

Under the Project with the East Site Hotel Option, four new buildings are proposed, including a 35-story “West Building,” a 46-story “East Building,” and two senior buildings set aside for Extremely Low and/or Very Low Income households (an 11-story “West Senior Building” on the West Site and a 9-story “East Senior Building” on the East Site.” The Project with the East Site Hotel Option would replace 104 of the market-rate units in the East Building with a 220-room hotel such that the proposed East Building would contain 220 hotel rooms and 319 market-rate residential housing units (there would be no change to the building height and massing for the East Building). Under the Project with the East Site Hotel Option, the East Senior Building would be reduced from 11 stories to 9 stories and would contain 48 affordable housing units. There would be no change to the West Site as described above under the Project with the East Site Hotel Option. Thus, the Project with the East Site Hotel Option, would develop approximately 1,272,741 square feet of developed floor area, including 884 residential dwelling units (768 market-rate units and 116 senior affordable housing units) totaling approximately 1,112,287 square feet of residential floor area, a 220-room hotel totaling approximately 130,278 square feet of floor area, 30,176 square feet of commercial floor area (retail and restaurant uses), and including the existing 114,303 square foot Capitol Records Complex (consisting of the 92,664 square-foot Capitol Records Building and the 21,639 square-foot Gogerty Building), for a total buildable area of 1,387,044 square feet. In addition, the Project with the East Site Hotel Option would feature 150,371 square feet of open space and amenities, including a Paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events. The Project with the East Site Hotel Option would have a floor area ratio of 6.903 and provide a net residential density of approximately 198 dwelling units per acre pre-dedication and 192 dwelling units per acre

⁵ Post-dedication includes the 1,267-square-foot East Site Alley Merger and the 5,163-square-foot sidewalk merger (along Yucca Street and both sides of Vine Street) area.

⁶ Calculated as 1,256,974 square feet / 1,401,453 square feet = 90 percent.

post-dedication.⁷ Thus, the Project under the Project with the East Site Hotel Option would consist of building floor area that would be considered approximately 80 percent residential building floor area⁸ and the Project would meet the criteria of at least 75 percent of the total building square footage consisting of residential use.

Public Resources Code in §21155 defines a transit priority project as a project that (1) contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75; (2) provides a minimum net density of at least 20 dwelling units per acre; and (3) is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. The Project and Project with the East Site Hotel Option represents an infill development within an existing urbanized area that would concentrate new residential and neighborhood-serving commercial retail and restaurant uses within an identified Transit Priority Area, which is defined by the City as an area means an area within one-half mile of a major transit stop that is existing or planned⁹, and within a HQTAs, which is defined by the 2016 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. The Project Site is located within a quarter-mile of public transportation, including the Hollywood/Vine Metro Red Line Station, which extends to Union Station and connects Downtown Los Angeles to North Hollywood. The Project is also within a quarter mile of many Metro bus routes including the Metro Local Lines 180/181, 210, 212/312, 217, and 222, Metro Rapid Line 780, and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire. In addition, the Project and Project with the East Site Hotel Option would also provide up to 551 bicycle parking spaces and up to 554 bicycle parking spaces, respectively, with bicycle lockers and showers for Project and Project with the East Site Hotel Option residents and employees. By locating the Project's and Project with the East Site Hotel Option's proposed residential uses within an area that has existing high quality public transit (with access to existing regional bus and rail service), employment opportunities, restaurants and entertainment, all within walking distance, and by including features that support and encourage pedestrian activity and other non-vehicular transportation and increased transit use in Hollywood neighborhood of Los Angeles area, the Project and Project with the East Site Hotel Option would minimize transportation-related air pollutant and GHG emissions. Furthermore, as discussed above, the Project and Project with the East Site Hotel Option would contain at least 75 percent residential use based on total building square footage, have a floor area ratio greater than 0.75, and provide a residential net density of more than 20 dwelling units per acre. Therefore, the Project would also meet the alternative criteria of being a transit priority project.

2. Project Consistency with Land Use-Related Designations and Applicable Policies

a. Land Use-Related Designations

The Project would also be consistent with the general land use designation, density, and building intensity outlined in the SCAG 2016 RTP/SCS. Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into "land use types," then combined these land use types into 35 place types, and then classified sub-regions into one of three land use development categories: urban, compact, or standard. SCAG

⁷ Post-dedication includes the 1,267-square-foot East Site Alley Merger and the 5,163-square-foot sidewalk merger (along Yucca Street and both sides of Vine Street) area.

⁸ Calculated as 1,112,287 square feet / 1,387,044 square feet = 80 percent.

⁹ City of Los Angeles, Department of City Planning, Zoning Information File ZI NO. 2451 Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA, <https://www.alston.com/files/docs/ZI%202451-TPA-Aesthetics-and-Parking.pdf>. Accessed March 2020.

used each of these three categories to describe the conditions that exist and/or are likely to exist within each specific area of the region.¹⁰

The City of Los Angeles existing General Plan land use designation for the Project Site is Regional Center Commercial (City of Los Angeles Hollywood Community Plan General Plan Land Use Map, refer to the attached **Figure 1**).¹¹ For the area immediately surrounding the Project Site, the existing General Plan land use designations are Regional Center Commercial, High Density Multi-Family Residential and Public Facilities north of Yucca Street, a mix of Regional Center Commercial and Medium Density Multi-Family Residential to the east across Argyle Avenue, and Regional Center commercial to the west across Cahuenga Boulevard and south across Hollywood Boulevard. The Project would develop the Project Site with four new buildings including residential and commercial uses (two on the West Site and two on the East Site), which would be consistent with the existing uses described above for the Project Site and surrounding area.

The Project is located in an area that the SCAG 2016 RTP/SCS identifies for future growth and densification through 2040 for four scenarios, as depicted in Exhibits 35 through 38 of the SCAG 2016 RTP/SCS Background Documentation,¹² which are attached as **Figure 2** through **Figure 5** of this Technical Memorandum. As shown in these figures, the Project Site is located within the SCAG-identified areas for growth and densification. Therefore, the growth associated with the Project is consistent the planning and growth assumptions included in the RTP/SCS. In contrast, a project located outside of a planned growth area may be inherently inconsistent with SCAG's land use assumption and growth forecasts for purposes of Public Resources Code §21159.28 eligibility.

For its 2016 RTP/SCS, SCAG converted the identified General Plan land use data into Scenario Planning Zone-level place types and categorized the Project Site and the area surrounding the Project Site as a urban land development area, as depicted in Exhibit 13 for year 2012 and Exhibit 14 for year 2040 of the SCAG 2016 RTP/SCS Background Documentation, which are attached as **Figure 6** and **Figure 7** of this Technical Memorandum .¹³

The Project Site is located in an area that the SCAG 2016 RTP/SCS identifies for future growth and densification through 2040;¹⁴ therefore, the Project is consistent with this goal of the RTP/SCS. The 2016 RTP/SCS defines the urban land development category as areas that “are often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of

¹⁰ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, pages 20-21, (2016), <http://scagrtppscs.net/Pages/FINAL2016RTPSCS.aspx>. Accessed March 2020.

¹¹ City of Los Angeles, Hollywood Community Plan-General Plan Land Use Map, (2014), <https://planning.lacity.org/odocument/17308382-2458-45c4-a327-54cd9593955a/hwdplanmap.pdf>.

¹² Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Background Documentation, Exhibits 35-38 New Growth (2012-2040), (2015), http://scagrtppscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf. Accessed March 2020.

¹³ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Background Documentation, Exhibit 13 Forecasted Regional Development Types (2012) – Los Angeles City Subregion, (2015), http://scagrtppscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf. Accessed March 2020.

¹⁴ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Background Documentation, Exhibits 35-38 New Growth (2012-2040), (2015), http://scagrtppscs.net/Documents/2016/final/f2016RTPSCS_SCSBackgroundDocumentation.pdf. Accessed March 2020.

uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.”¹⁵

The 2016 RTP/SCS identifies place types for the three land development categories. For the urban land development category, the 2016 RTP/SCS identifies the following place types: Urban Mixed Use; Urban Residential; Urban Commercial; City Mixed Use; City Residential; City Commercial.¹⁶ Other place types that could be located in any of the three land development categories are Campus/University, Institutional, and Parks and Open Space.¹⁷ The 2016 RTP/SCS identifies additional detailed information and assumptions for these place types in supplemental documentation.¹⁸ A discussion of the Project’s consistency with the applicable SCAG place types for the urban land development category is provided below.

The Project’s two mixed-use buildings, the West Building and East Building, would be consistent with the 2016 RTP/SCS Urban Mixed Use and Urban Residential place type. According to supplemental documentation for the 2016 RTP/SCS, the Urban Mixed Use place type is described as areas with a gross density range of between 40 to 500+ households per acre and where “typical buildings are between 10 and 40+ stories tall, with offices and/or residential uses and ground-floor retail space. Parking is usually structured below or above ground. Workers, residents, and visitors are well served by transit, and can walk or bicycle for many of their transportation needs.”¹⁹ The Urban Residential place type is described as areas with a gross density range of between 75 to 500+ households per acre and “are typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs.”²⁰ As discussed above, the Project and the Project with the East Site Hotel Option would result in the development of a 35-story West Building and a 46-story East Building. The Project would also develop two, 11-story senior buildings (West Senior Building and the East Senior Building), while the Project with the East Site Hotel Option would develop an 11-story West Senior Building and a 9-story East Senior Building. The Project would result in 1,005 residential dwelling units (872 market-rate units and 133 senior affordable housing units), which equates to approximately 225 households (dwelling units) per acre.²¹ The Project with the East Site Hotel Option would result in 884 residential dwelling units (768 market-rate units and 116 senior affordable housing units), which equates to approximately 198 households (dwelling units) per acre.²² The Project Site is located in a City defined Transit Priority Area (TPA)²³ and a SCAG defined high-quality transit area (HQTA)²⁴ where the Project Site is located within a quarter mile of high-quality transit including the Metro Local Lines 180/181, 210, 212/312, 217, and 222, Metro Rapid Line 780,

¹⁵ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 21, (2016), <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. Accessed March 2020.

¹⁶ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Background Documentation, Reference Document 9, (2016), http://www.scagrtpscs.net/Documents/2016/supplemental/LDC_PlaceType.pdf. Accessed March 2020.

¹⁷ Ibid.

¹⁸ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy Background Documentation, Reference Document 6, (2016), http://scagrtpscs.net/documents/2016/supplemental/UrbanFootprint_PlaceTypesSummary.pdf. Accessed March 2020.

¹⁹ Ibid.

²⁰ Ibid.

²¹ Calculated as 1,005 dwelling units / 4.46 = 225 dwelling units per acre.

²² Calculated as 884 dwelling units / 4.46 = 198 dwelling units per acre.

²³ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, page 8, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed March 2020.

²⁴ Southern California Association of Governments, 2016 RTP/SCS, pages 20, 75-77.

and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire and the Metro Red Line at the Metro Red Line Hollywood/Vine station, which extends to Union Station and connects Downtown Los Angeles to North Hollywood.

The building heights and densities of Project and the Project with the East Site Hotel Option would be consistent with the SCAG 2016 RTP/SCS Urban Mixed Use and Urban Residential place types for the urban land development category. Therefore, the Project and the Project with the East Site Hotel Option would be consistent with the general land use designation, density, and building intensity outlined in the SCAG 2016 RTP/SCS for the Project area and consistent with the place type assumptions such as being set within an urban infill and transit-oriented area.

The Project Site is located within the boundaries of the Hollywood Community Plan, adopted in 1988 that also designates the Project Site as Regional Center Commercial. The Project is consistent with the land use objectives of the 1988 Hollywood Community Plan, including the land use objectives of furthering the development of Hollywood as a major center of population, employment, and retail services; providing land uses at densities required to accommodate future growth in the area; and providing housing for a variety of income levels. The Project would provide new multi-family residential, and restaurant/retail development within the Hollywood community, which would increase housing, employment opportunities, and services for the growing population. Under the Project with the East Site Hotel Option, there would be 220 hotel rooms added to the area, thus supporting tourism and the economic viability of the entertainment, commercial, and tourist activities in the area. The Project would enhance the urban character of the area, with an emphasis on activating Vine Street for pedestrians and cyclists and creating a stronger connection to the Hollywood Walk of Fame and Capital Records Complex enhancing the area's image. The provision of neighborhood serving commercial uses provided alongside open space uses at the ground level of the Project would support the Project Site's residents as well as other off-site residents, tourists, and visitors by providing commercial, recreational and entertainment services within an accessible, walkable environment. The Project would contribute to the development of Hollywood as a Regional Center and would be located in close proximity to existing public transit including the Metro Red Line Hollywood/Vine Station, other regional Metro bus routes, and LADOT DASH lines that provide public transit throughout the Hollywood area and City of Los Angeles. The Project is located in an area that is targeted for high-density growth on the Framework Element Land Use Diagram and a district that has been evolving into an increasingly mixed-use area. The Project would result in 1,005 residential dwelling units (872 market-rate units and 133 senior affordable housing units) and the Project with the East Site Hotel Option would result in 884 residential dwelling units (768 market-rate units and 116 senior affordable housing units). The 133 senior affordable units under the Project or 116 senior affordable units under the Project with the East Site Hotel Option would be set aside for Extremely Low and/or Very Low Income households providing a range of housing choices for various economic segments. The development is also concentrated within a Regional Center and TPA located within 600 feet of the Metro Red Line Hollywood/Vine Station and within convenient distance from multiple regional Metro bus routes, and LADOT DASH Lines. The Project and the Project with East Site Hotel Option is also sited and designed to focus greater intensity development adjacent to Vine Street, where both Project buildout options would develop the 35-story West Building and 46-story East Building located toward the center of the development and the Project would also develop two, 11-story senior buildings (West Senior Building and the East Senior Building), while the Project with the East Site Hotel Option would develop an 11-story West Senior Building and a 9-story East Senior Building toward the periphery of the Project Site providing a transition to adjacent lower-scale, residential development which ranges from one to 18 stories and comprises both mixed-use and residential buildings. The City is currently working on an update to the Hollywood Community Plan, and preparation of an Environmental Impact Report is in progress. The Draft EIR for the Hollywood Community Plan Update 2 (HCPU2)

was released on November 15, 2018.²⁵ The partial recirculation to the Draft EIR for the HCPU2 was released on October 31, 2019.²⁶ The Final EIR for the HCPU2 has not yet been published and the HCPU2 has not been adopted as of the date of this Technical Memorandum. Therefore, the policies and objectives of that plan are not applicable, and is not considered in this technical memorandum.

b. Project Consistency with Applicable Policies

A detailed analysis of the Project's consistency with the individual actions, strategies, and policies set forth in the SCAG 2016 RTP/SCS is presented in Section IV.E, *Greenhouse Gas Emissions*, of the Project's Draft Environmental Impact Report (EIR). A summary of that analysis is presented here. Based on the analysis presented in Section IV.E of the Project's Draft EIR and summarized here, the Project would be consistent with the applicable policies set forth in the 2016 RTP/SCS.

The purpose of the SCAG 2016 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2016 RTP/SCS, certified on April 7, 2016, states that "[e]ach [Metropolitan Planning Organization] is required to prepare an SCS in conjunction to [sic] with the RTP in order to meet these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375."²⁷ The 2016-2040 RTP/SCS seeks "improved mobility and accessibility... to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices."²⁸ The 2016-2040 RTP/SCS seeks to implement "strategies focused on compact infill development, superior placemaking (the process of creating public spaces that are appealing), and expanded housing and transportation choices."²⁹ As part of the 2016-2040 RTP/SCS, "transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's growth would be encouraged to accommodate increases in population, households, employment, and travel demand."³⁰ Moreover, the 2016-2040 RTP/SCS states that while "[p]opulation and job growth would induce land use change (development projects) and increase VMT, and would result in direct and indirect GHG emissions," the 2016-2040 RTP/SCS would "support sustainable growth through a more compact, infill, and walkable development pattern."³¹

Consistent with SCAG's 2016 RTP/SCS alignment of transportation, land use, and housing strategies, the Project would accommodate increases in population, households, employment, and travel demand by implementing smart land use strategies. The applicable 2016 RTP/SCS actions, strategies, and policies are grouped into the following

²⁵ City of Los Angeles Department of City Planning, Hollywood Community Plan Update Draft Environmental Impact Report, November 2018, https://planning.lacity.org/eir/Hollywood_CPU/Deir/Hollywood%20Community%20Plan%20Update%20Index.html. Accessed March 2020.

²⁶ City of Los Angeles Department of City Planning, Hollywood Community Plan Update Partially Recirculated Draft Environmental Impact Report (EIR), October 2019, https://planning.lacity.org/eir/Hollywood_CPU/deir_PartiallyRecirculated/Hollywood%20Community%20Plan.html. Accessed March 24, 2020.

²⁷ Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2015, page 3.8-37.

²⁸ Southern California Association of Governments, 2016 RTP/SCS, April 2016, page 160.

²⁹ Southern California Association of Governments, 2016 RTP/SCS, April 2016, page 14.

³⁰ Southern California Association of Governments Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, pages 3.8-35.

³¹ Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016, page 3.8-36.

categories: Land Use Actions and Strategies; Transportation Network Actions and Strategies; Transportation Demand Management (TDM) Actions and Strategies; and Clean Vehicle Technology Actions and Strategies.

i. Land Use Actions and Strategies

The applicable SCAG 2016 RTP/SCS actions, strategies, and policies in the Land Use Actions and Strategies category reflect site development strategies such as providing neighborhood-oriented development and complete streets; providing electric (and other alternative fuel) vehicle supply equipment; providing safe opportunities for walking, bicycling, and physical activity to promote community health; and promoting a mix of residential, commercial, industrial, recreational and institutional uses.

The Project would be consistent with these strategies by designating a minimum of 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles and by providing conduit and electrical pre-wiring to support future installation of electric vehicle (EV) charging equipment beyond the applicable California Green Building (CALGreen) Code and Los Angeles Municipal Code requirements as the Project will provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations. Vehicular parking for the Project will be provided in two parking garages, one on each site. For the West Site, a total of 837 vehicular parking spaces would be provided within a five-floor subterranean and grade level parking garage that would serve both the West Building and West Senior Building: 656 spaces for the West Building, 39 for the West Senior Building, and 142 spaces for the commercial uses. For the East Site, a total 684 vehicular parking spaces on the East Site within a five- floor subterranean and grade level parking garage that would serve both buildings: 508 for the East Building, 39 for the East Senior Building, 40 for the commercial uses, and 97 spaces as part of the Capitol Records Building parking space replacement. Under the Project with the East Site Hotel Option, the West Site parking would remain the same, however the East Site Parking garage would adjust the allocation of spaces where for the provided 684 vehicular parking spaces: 448 for the residential uses, 99 spaces for the hotel, and 137 (40 spaces for restaurant/retail uses and 97 spaces for Capitol Records) for the commercial uses

The Project would also facilitate pedestrian and bicycle movements through the ground level wide, landscaped paseo extending east-west through the Project Site, as well as, sidewalks around the perimeter of the Project Site that allow pedestrian access. Pedestrian access on the West Site would be provided from Vine Street for the main residential lobby of the West Building; from Ivar Street for the ground level lobby of the West Senior Building; and from Vine Street, Yucca Street, and Ivar Avenue for the restaurant uses on the West Site. Pedestrian access on the East Site would be provided from Vine Street for the residential lobby of the East Building; from Argyle Avenue for the ground level lobby of the East Senior Building; and from Argyle Avenue, Vine Street, and from the Project's paseo for the restaurant uses on the East Site. Residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking as the Project would provide 551 bicycle parking spaces and the Project with the East Site Hotel Option would provide 554 bicycle parking spaces. The Project would also connect to the surrounding commercial and recreational areas thereby facilitating pedestrian and bicycle travel. The Project would include 53,102 square feet of outdoor common open space (47,471 square feet of outdoor common open space under the Project with the East Site Hotel Option), such as the East Site's Lounge: an outdoor gathering space, with seating, fireplace, and library; East Plaza: a performance area with a stage that would host public acoustic performances from nearby community or school music groups; Garden: landscaped area, situated away from the adjacent streets and located inside of the block to provide a grassy area, seating alcoves, and a water feature to serve as a transition between the Lounge and

Plaza areas. Under both the Project and Project with the East Site Hotel Option, the East Building and West Building would both include landscaped areas that would include native plants, shrubs, perennials, and ground-cover. Both the West and East Sites would provide a large elevated garden for residents on the respective Level 2 amenity decks, outdoor amenity spaces with planting areas and canopy trees, and planting areas on the rooftop terraces for both Senior Buildings. Landscaping would be provided along the street edges and throughout the Project's open space areas and would utilize drought-tolerant native plants. In addition, seven neighborhood parks, five community parks, and three regional parks were identified within a two-mile radius of the Project Site, which would promote neighborhood-oriented safe walking, bicycling, and community health.

The Project is an urban infill project (refer to attached **Figure 1**), as it would replace existing commercial uses on underutilized parcels located in the Hollywood Neighborhood of Los Angeles with a high-density, mixed-use development including new residential and neighborhood-serving commercial retail and restaurant uses. The Project proposes higher density, consistent with compact growth, on a parcel of infill urban land accessible to and well served by public transit including frequent and comprehensive transit services, the development of which supports sustainable growth. Thus, the Project would be consistent with applicable 2016 RTP/SCS actions, strategies, and policies in the Land Use Actions and Strategies category.

ii. Transportation Network Actions

The applicable SCAG 2016 RTP/SCS actions, strategies, and policies in the Transportation Network Actions and Strategies category include strategies develop residential and employment development around current and planned transit stations and neighborhood commercial centers.

The Project Site is located in a City defined TPA³² and a SCAG defined HQTA³³ since the Project Site is within a quarter mile of high-quality transit including the Metro Local Lines 180/181, 210, 212/312, 217, and 222, Metro Rapid Line 780, and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire and the Metro Red Line at the Metro Red Line Hollywood/Vine station, which extends to Union Station and connects Downtown Los Angeles to North Hollywood. In addition to public transportation access, the Project Site is in a location that would also contribute to minimizing VMT from Project residents, employees and visitors as the Project is in close to proximity to existing off-site commercial and residential uses. In addition, the Project Site is in the Hollywood neighborhood of Los Angeles, a major jobs center³⁴, and as previously mentioned, the Project Site is within a quarter-mile of the Metro Red Line at the Metro Red Line Hollywood/Vine station, which extends to Union Station and to Downtown Los Angeles, another major jobs center.³⁵ The Project's proximity to public transportation options, retail and restaurant land uses, and major jobs centers would minimize future VMT associated with the Project compared to a non-infill project within the South Coast Air Basin as measured by the air quality and GHG emissions model. Thus, the Project would be consistent with applicable 2016 RTP/SCS actions, strategies, and policies in the Transportation Network Actions and Strategies category.

³² Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, page 8, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed March 2020.

³³ Southern California Association of Governments, 2016 RTP/SCS, pages 20, 75-77.

³⁴ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, Appendix: Demographics & Growth Forecast, page 43, <http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed March 2020.

³⁵ Ibid.

iii. TDM Actions and Strategies

The applicable SCAG 2016 RTP/SCS actions, strategies, and policies in the TDM Actions and Strategies category include strategies that support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.

The Transportation Assessment³⁶ prepared by Fehr and Peers and included in Appendix N-1 of the Project's Draft EIR, evaluated impacts relative to the City VMT's methodology. The Transportation Assessment discusses the Project's TDM program that includes TDM measures that will be incorporated into the Project and part of the Conditions of Approval. Potential strategies of the TDM include unbundling parking for residents, carpooling incentives for commercial tenants, shuttle services for hotels, and transit subsidies (available to residents and commercial employees) up to 50% of the cost of a monthly pass that will further encourage alternative modes of transportation, such as carpooling, taking transit, walking, and biking and discourage single-occupancy vehicle trips. As discussed above, the Project Site is located in a City defined TPA³⁷ and a SCAG defined HQT³⁸ since the Project Site is within a quarter mile of high-quality transit including the Metro Local Lines Metro Local Lines 180/181, 210, 212/312, 217, and 222, Metro Rapid Line 780, and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire and the Metro Red Line at the Metro Red Line Hollywood/Vine station, which extends to Union Station and connects Downtown Los Angeles to North Hollywood. Also discussed above, residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking as the Project would provide 551 bicycle parking spaces and the Project with the East Site Hotel Option would provide 554 bicycle parking spaces. The Project would designate a minimum of 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles and by providing conduit and electrical pre-wiring to support future installation of EV charging equipment beyond the applicable CALGreen Code and Los Angeles Municipal Code requirements as the Project will provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations. Thus, the Project would be consistent with applicable 2016 RTP/SCS actions, strategies, and policies in the TDM Actions and Strategies category.

iv. Clean Vehicle Technology Actions and Strategies

The applicable SCAG 2016 RTP/SCS actions and strategies in the Clean Vehicle Technology Actions and Strategies include strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emission technologies. As discussed above, the Project would be consistent with these strategies by designating a minimum of 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles and by providing conduit and electrical pre-wiring to support future installation of electric vehicle (EV) charging equipment beyond the applicable California Green Building (CALGreen) Code and Los Angeles Municipal Code requirements as the Project will provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations. Vehicular parking for the Project will be provided in two parking garages, one on each site.

³⁶ Fehr & Peers, Transportation Assessment for the Hollywood Center Project, November 2019.

³⁷ Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016, page 8, <http://scagrtpsc.net/Documents/2016/final/f2016RTPSCS.pdf>. Accessed March 2020.

³⁸ Southern California Association of Governments, 2016 RTP/SCS, pages 20, 75-77.

3. Project Incorporation of RTP/SCS Program EIR Mitigation Measures

The Final Project EIR (PEIR) for the 2016 RTP/SCS identifies mitigation measures for each of the environmental topics analyzed in the PEIR. For each environmental topic, these mitigation measures are presented under the following two subheadings: (1) SCAG Mitigation Measures, and (2) Project Level Mitigation Measures. The analysis presented below addresses those GHG-related measures identified as Project Level Mitigation Measures. Mitigation measures identified as SCAG Mitigation Measures are measures that relate to actions that will be taken by SCAG to implement the 2016 RTP/SCS and, for this reason, these measures are not analyzed further as they are not applicable to an individual development such as the Project. The EIR for the City of Los Angeles's Hollywood Community Plan Update does not propose any mitigation measures related to reducing GHGs and was therefore not included in the below analysis.³⁹

Specific to GHG emissions, all mitigation measures in the 2016 RTP/SCS PEIR are incorporated into Final PEIR Mitigation Measure MM-GHG-3(b).⁴⁰ A detailed analysis of the Project's general consistency with the applicable and substantive requirements of GHG Mitigation Measure MM-GHG-3(b) is presented in **Table 1** of this analysis for informational purposes because MM-GHG-3(b) is intended to be applied as applicable and feasible by SCAG in coordination with local agencies to implement the RTP/SCS. Based on the analysis presented in Table 1, the Project is consistent with the applicable and substantive requirements of the GHG mitigation measures set forth within the Final PEIR for the 2016 RTP/SCS.

TABLE 1
SCAG 2016 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE COMMUNITIES STRATEGY
PROJECT INCORPORATION OF APPLICABLE PROGRAM EIR MITIGATION MEASURES

Sector / Source	Consistency Analysis
<p>MM-GHG-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting greenhouse gas mitigation measures that have been used for projects in the SCAG region as set forth below, or through comparable measures identified by Lead Agency:</p>	<p>Consistent: The Project would incorporate designs that would be consistent with the applicable and substantive requirements of the GHG mitigation measures set forth within the Final PEIR for the 2016 RTP/SCS. The analysis provided below demonstrates the Project's consistency for each of the applicable project-level GHG mitigation measures from the 2016 RTP/SCS Final PEIR.</p>

³⁹ City of Los Angeles, Hollywood Community Plan Update Draft Environmental Impact Report (EIR), https://planning.lacity.org/eir/Hollywood_CPU/Deir/Hollywood%20Community%20Plan%20Update%20Index.html.

⁴⁰ Southern California Association of Governments, Program Environmental Impact Report – 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Section 3.8, Greenhouse Gas Emissions, 2015, page 3.8-43-45, http://scagtrpssc.net/Documents/2016/peir/draft/2016dPEIR_3_8_GreenhouseGases.pdf. Accessed March 2020.

Sector / Source	Consistency Analysis
<ul style="list-style-type: none"> Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision. 	<p>As evaluated in detail in Section IV.E, <i>Greenhouse Gas Emissions</i>, of the Project's Draft EIR, the Project would be consistent with applicable City GHG reduction plans, policies, and regulations, such as the City's Green Building Code and LA's Green New Deal Sustainability pLAn 2019. The Project would be consistent with applicable strategies and would not impede the implementation of GHG reduction strategies in the CARB 2017 Climate Change Scoping Plan.</p>
<ul style="list-style-type: none"> Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. 	<p>As evaluated in detail in Section IV.E, <i>Greenhouse Gas Emissions</i>, of the Project's Draft EIR, the Project would be consistent with applicable City GHG reduction plans, policies, and regulations, such as the City's Green Building Code and LA's Green New Deal Sustainability pLAn 2019.. The Project would be consistent with applicable strategies and would not impede the implementation of GHG reduction strategies in the CARB 2017 Climate Change Scoping Plan. Appendix F of the State CEQA Guidelines is evaluated in detail in Section IV.O, <i>Energy Conservation and Infrastructure</i>, of the Project's Draft EIR. As evaluated therein, the Project with incorporation of Project Design Features would not result in the wasteful, inefficient, and unnecessary consumption of energy and 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.</p>
<ul style="list-style-type: none"> Off-site measures to mitigate a project's emissions. 	<p>This measure is not applicable. As evaluated in detail in Section IV.E, <i>Greenhouse Gas Emissions</i>, of the Project's Draft EIR, the Project would result in a less than significant impact with respect to GHG emissions and mitigation measures would not be required under CEQA.</p>

Sector / Source	Consistency Analysis
<ul style="list-style-type: none"> • Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: <ul style="list-style-type: none"> ○ Use energy and fuel efficient vehicles and equipment. Project proponents are encouraged to meet and exceed all EPA/NHTSA/CARB standards relating to fuel efficiency and emission reduction; ○ Use alternative (non-petroleum based) fuels; ○ Deployment of zero- and/or near zero emission technologies as defined by CARB; ○ Use lighting systems that are energy efficient, such as LED technology; ○ Use the minimum feasible amount of GHG-emitting construction materials that is feasible; ○ Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production; ○ Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste reduction, recycling and reuse; ○ Incorporate passive solar and other design measures to reduce energy consumption and increase production and use of renewable energy; ○ Incorporate design measures like Water Sense fixtures and water capture to reduce water consumption; ○ Use lighter-colored pavement where feasible; ○ Recycle construction debris to maximum extent feasible; ○ Protect and plant shade trees in or near construction projects where feasible; and ○ Solicit bids that include concepts listed above. 	<p>As evaluated in detail in Section IV.E, <i>Greenhouse Gas Emissions</i>, of the Project's Draft EIR, the Project would incorporate energy-efficient measures as part of meeting the LEED Gold Certification level or equivalent green building standard, which reduces the Project's overall electricity demand.</p> <p>The Project would be consistent with these strategies by designating a minimum of 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles and by providing conduit and electrical pre-wiring to support future installation of EV charging equipment beyond the applicable CALGreen Code and Los Angeles Municipal Code requirements where the Project will provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations.</p> <p>The Project would also meet the applicable requirements of the Los Angeles Green Building Code and the CALGreen Code. The Project would be constructed in compliance with Title 24 California Green Building Standards and incorporate various sustainability features where the Project will reduce water consumption by 40 percent for indoor water and 100 percent for outdoor water from the LEED usage baseline. The reductions would be achieved through potential strategies including but not limited to installation of water efficient fixtures that exceed applicable standards and water efficient landscaping.⁴¹ The Project will also optimize building energy performance with a 20 percent reduction from the LEED baseline consistent with LEED requirements (equivalent to approximately 11.6 percent reduction from the 2016 Title 24 standards). The optimization would be achieved through potential strategies including but not limited to installation of energy-efficient appliances and equipment.</p> <p>The Project would be served by a solid waste collection and recycling service, approved or licensed to collect solid waste in the City, that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with Citywide recycling targets. According to the City of Los Angeles <i>Zero Waste Progress Report</i> (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012,⁴² which exceeds the State goal of 75 percent recycling, composting or source reduction of solid waste by 2020.⁴³</p> <p>Thus, the Project would be consistent with the applicable and substantive requirements of this measure.</p>

⁴¹ Project water demand values were taken from LADWP's Water Supply Assessment – Hollywood Center Project, November 2018, that incorporate water reductions and savings due to City of Los Angeles Ordinance No. 180822 and No. 184248 that go beyond the LEED usage baseline. Therefore, as a conservative assessment, additional reductions due to LEED commitments were not incorporated into Project water use demand for greenhouse gas emissions modeling.

⁴² City of Los Angeles, Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013, https://planning.lacity.org/eir/8150Sunset/References/4.K.3.%20Solid%20Waste/SW.04_Zero%20Waste%20Progress%20Report_March%202013.pdf. Accessed November 2017.

⁴³ CalRecycle, California's 75 Percent Initiative: Defining the Future, August 17, 2017, <http://www.calrecycle.ca.gov/75Percent/>. Accessed March 2020.

Sector / Source	Consistency Analysis
<ul style="list-style-type: none"> Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles; 	<p>The Project Site is located in a City defined TPA and a SCAG defined HQTa, since the Project Site is within a quarter mile of high-quality transit including the Metro Local Lines 180/181, 210, 212/312, 217, and 222, Metro Rapid Line 780, and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire and the Metro Red Line at the Metro Red Line Hollywood/Vine station, which extends to Union Station and connects Downtown Los Angeles to North Hollywood. In addition to public transportation access, the Project Site is in a location that would also contribute to minimizing VMT from Project residents, employees and visitors as the Project is in close to proximity to existing off-site commercial and residential uses. In addition, the Project Site is in the Hollywood neighborhood of Los Angeles, a major jobs center, and as previously mentioned, the Project Site is within a quarter-mile of the Metro Red Line at the Metro Red Line Hollywood/Vine station, which extends to Union Station and to Downtown Los Angeles, another major jobs center. The Project would also facilitate pedestrian and bicycle movements through the ground level wide, landscaped paseo extending east-west through the Project Site, as well as, sidewalks around the perimeter of the Project Site that allow pedestrian access. Pedestrian access on the West Site would be provided from Vine Street for the main residential lobby of the West Building; from Ivar Street for the ground level lobby of the West Senior Building; and from Vine Street, Yucca Street, and Ivar Avenue for the restaurant uses on the West Site. Pedestrian access on the East Site would be provided from Vine Street for the residential lobby of the East Building; from Argyle Avenue for the ground level lobby of the East Senior Building; and from Argyle Avenue, Vine Street, and from the Project's paseo for the restaurant uses on the East Site. Residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking as the Project would provide 551 bicycle parking spaces and the Project with the East Site Hotel Option would provide 554 bicycle parking spaces.</p>
<ul style="list-style-type: none"> Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network; 	<p>Residents, visitors, patrons, and employees arriving to the Project Site by bicycle would have the same access opportunities as pedestrians and would be able to utilize on-site bicycle parking as the Project would provide 551 bicycle parking spaces and the Project with the East Site Hotel Option would provide 554 bicycle parking spaces.</p>
<ul style="list-style-type: none"> Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and 	<p>The Project Site is located in a City defined TPA and a SCAG defined HQTa since the Project Site is within a quarter mile of high-quality transit including the Metro Local Lines 180/181, 210, 212/312, 217, and 222, Metro Rapid Line 780, and LADOT DASH lines Hollywood, Beachwood Canyon, and Hollywood/Wilshire and the Metro Red Line at the Metro Red Line Hollywood/Vine station, which extends to Union Station and connects Downtown Los Angeles to North Hollywood</p>
<ul style="list-style-type: none"> Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs. 	<p>Portions of this measure are not applicable. The Project TDM plan (see Section IV.L, <i>Transportation</i>, of the Project's Draft EIR for more information) would include a variety of measures that would promote transit use by residents and employees through incentives. Refer to Section IV.L, <i>Transportation</i>, for information regarding the TDM Program.</p>
<ul style="list-style-type: none"> Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles; 	<p>The Project would designate a minimum of 8 percent of on-site non-residential parking for carpool and/or alternative-fueled vehicles.</p>

Sector / Source	Consistency Analysis
<ul style="list-style-type: none"> Land use siting and design measures that reduce GHG emissions, including: <ul style="list-style-type: none"> Developing on infill and brownfields sites; Building high density and mixed use developments near transit; Retaining on-site mature trees and vegetation, and planting new canopy trees; Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse. 	<p>The Project is an urban “infill” project (refer to Figure 1), as it would replace existing commercial uses on underutilized parcels located in the Hollywood Neighborhood of Los Angeles with a high-density, mixed-use development including new residential and neighborhood-serving commercial retail and restaurant uses. The Project proposes higher density, consistent with compact growth, on a parcel of infill urban land accessible to and well served by public transit including frequent and comprehensive transit services, the development of which supports sustainable growth.</p> <p>The Project would contain 166,582 square feet of open space and amenities, including a Paseo with shopping, seating, open air dining, and art installations, and plazas accommodating performances and community focused events (150,371 square feet of open space and amenities under the Project with the East Site Hotel Option). The Project would include 53,102 square feet of outdoor common open space (47,471 square feet of outdoor common open space under the Project with the East Site Hotel Option). All of the open spaces areas would have extensive landscaping and well-detailed hardscape. The Project would also include 130 trees on the West Site and 122 trees on the East Site..</p> <p>The Project would be consistent with these strategies by providing conduit and electrical pre-wiring to support future installation of EV charging equipment beyond the applicable CALGreen Code and Los Angeles Municipal Code requirements where the Project will provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations.</p> <p>The Project would be served by a solid waste collection and recycling service, approved or licensed to collect solid waste in the City, that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with Citywide recycling targets. According to the City of Los Angeles <i>Zero Waste Progress Report</i> (March 2013), the City achieved a landfill diversion rate of approximately 76 percent by year 2012,⁴⁴ which exceeds the State goal of 75 percent recycling, composting or source reduction of solid waste by 2020.⁴⁵</p>

SOURCE: SCAG 2015; ESA 2020.

Conclusion

As CARB has accepted the GHG reduction levels achieved by the 2016 RTP/SCS, the Project must meet the following criteria to be exempt from conducting further analysis of GHG emissions from cars and light-duty trucks:

- The project must be either a residential or mixed-use residential project where at least 75 percent of the total building square footage of the project consists of residential use, or a project that is a Transit Priority Project (TPP) as defined in §21155.
- The project must be consistent with the use designation, density, building intensity, and applicable policies specified for the project area in a CARB-accepted SCS.

⁴⁴ City of Los Angeles, Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013, <https://bioenergyproducers.files.wordpress.com/2016/11/la-zero-waste-report.pdf>. Accessed November 2017.

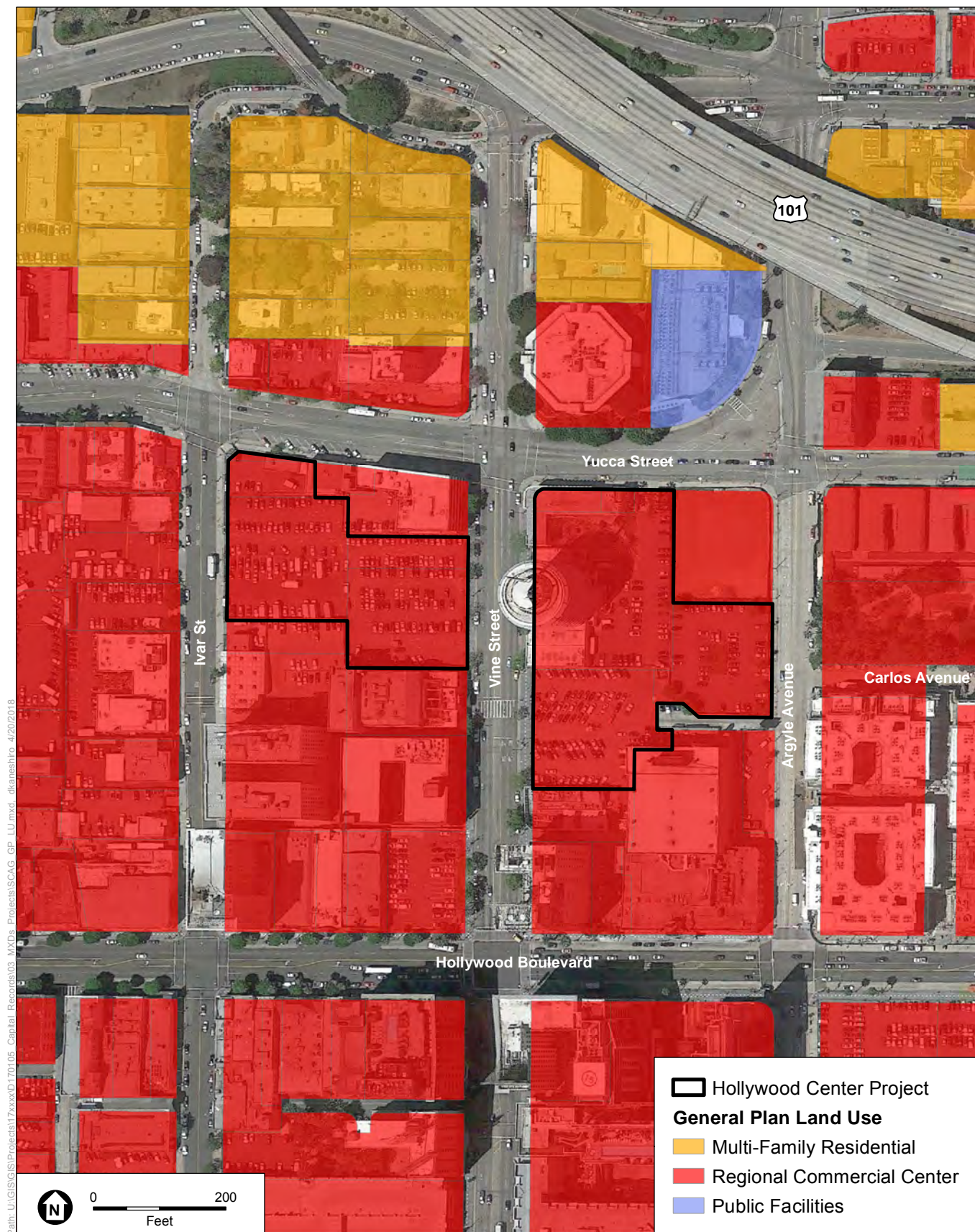
⁴⁵ CalRecycle, California’s 75 Percent Initiative: Defining the Future, August 17, 2017, <http://www.calrecycle.ca.gov/75Percent/>. Accessed March 2020.

- The project must incorporate the mitigation measures required by an applicable prior environmental document. In the case of the SCAG 2016 RTP/SCS, the applicable environmental document is the Program Environmental Impact Report (PEIR) that was prepared for the plan.

The analysis provided above demonstrates that the Project would be consistent with the use designation, density, and intensity levels that have been established for the Project Site. In addition, the Project would consist of more than 75 percent of the total building square footage as residential development. As discussed above, the Project would be consistent with the applicable policies set forth in the 2016 RTP/SCS. The analysis provided above also demonstrates that the Project is consistent with the applicable mitigation measures set forth in the PEIR for the 2016 RTP/SCS. As all of the SB 375 CEQA streamlining requirements have been met, additional analysis of GHG impacts from cars and light-duty trucks is not required pursuant to the provisions set forth in SB 375 and Public Resources Code §21159.28.

Attachments

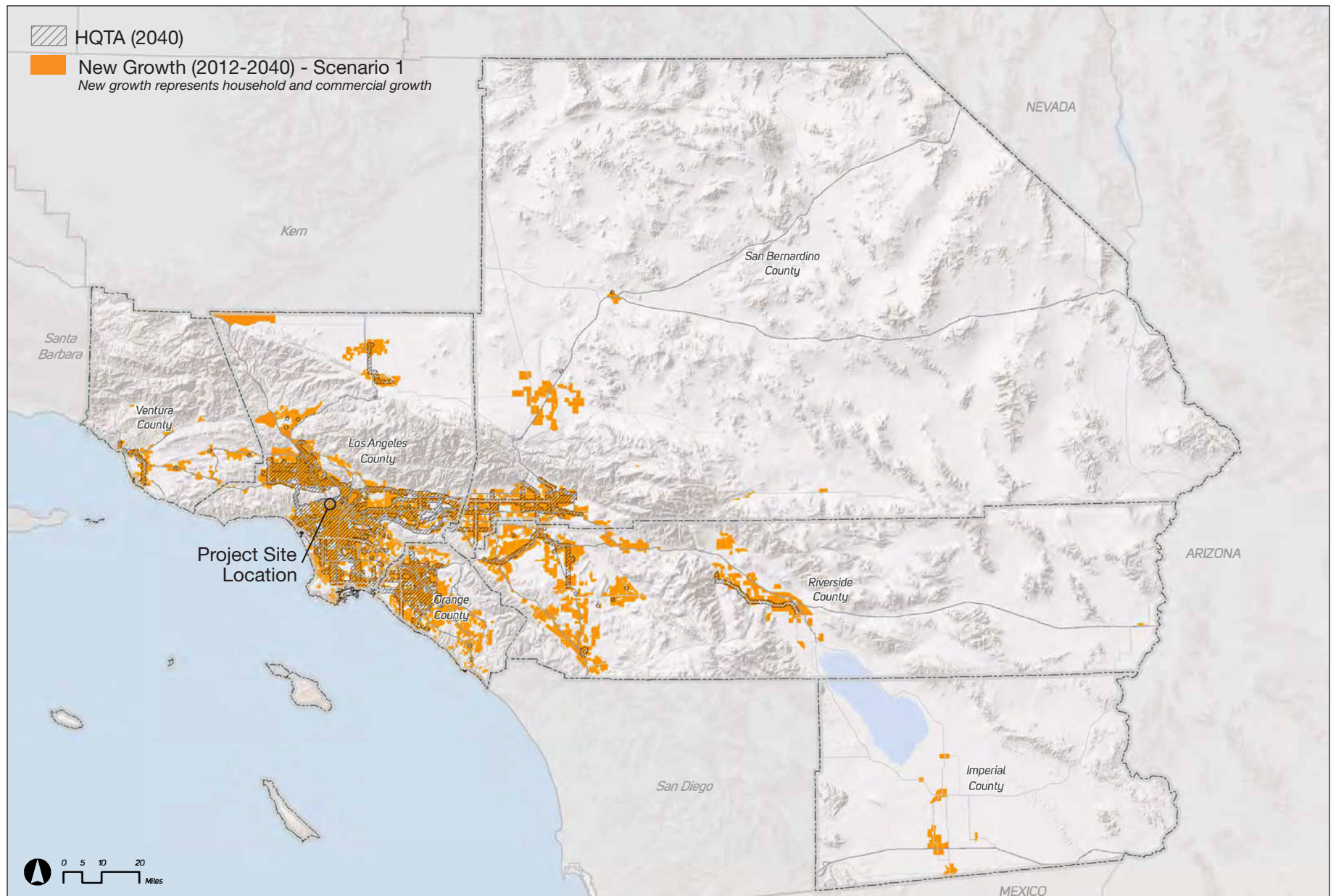
- Figure 1, General Plan Land Uses
- Figure 2, SCAG Exhibit 35 - New Growth (2012-2040) – Scenario 1
- Figure 3, SCAG Exhibit 36 - New Growth (2012-2040) – Scenario 2
- Figure 4, SCAG Exhibit 37 - New Growth (2012-2040) – Scenario 3
- Figure 5, SCAG Exhibit 38 - New Growth (2012-2040) – Scenario 4
- Figure 6, SCAG Exhibit 13 - Forecasted Regional Development Types by Land Development Categories (2012) - Los Angeles City Subregion
- Figure 7, SCAG Exhibit 14 - Forecasted Regional Development Types by Land Development Categories (2040) - Los Angeles City Subregion



SOURCE: Google Earth, 2014-04-23 (Aerial); SCAG 2012.

Hollywood Center Project

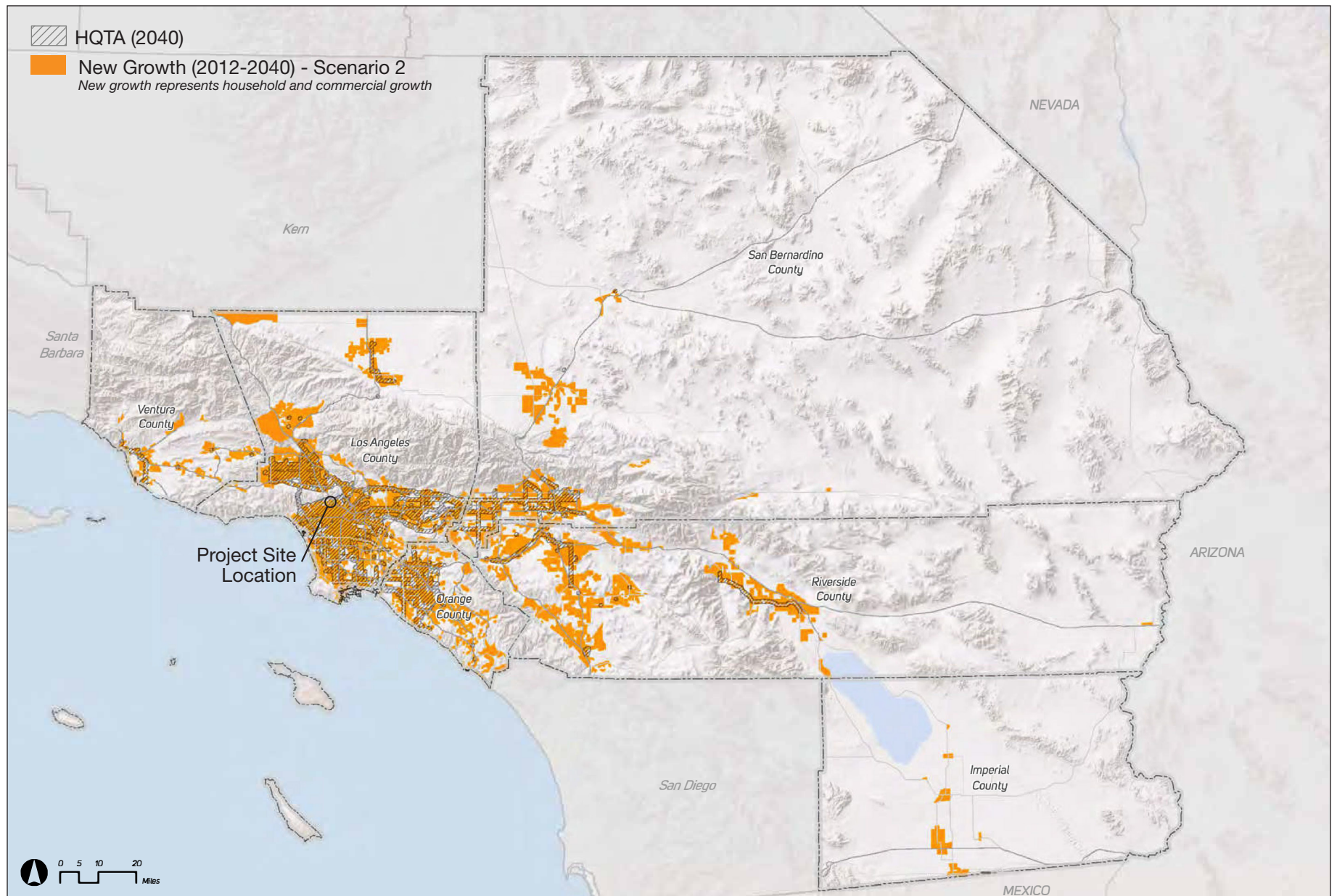
Figure 1
General Plan Land Uses



SOURCE: SCAG, 2015

Hollywood Center Project

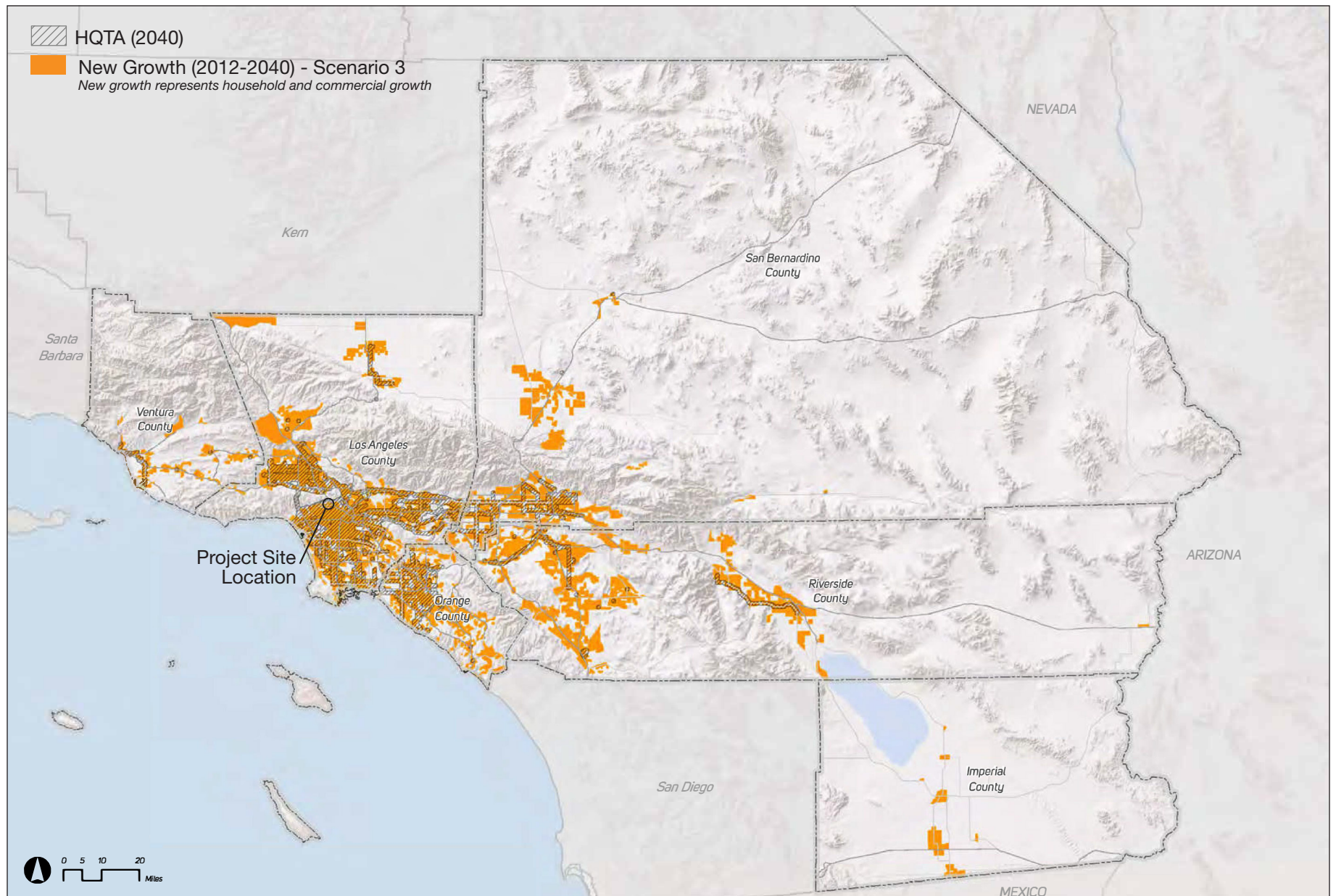
Figure 2
 SCAG Exhibit 35 – New Growth (2012-2040) – Scenario 1



SOURCE: SCAG, 2015

Hollywood Center Project

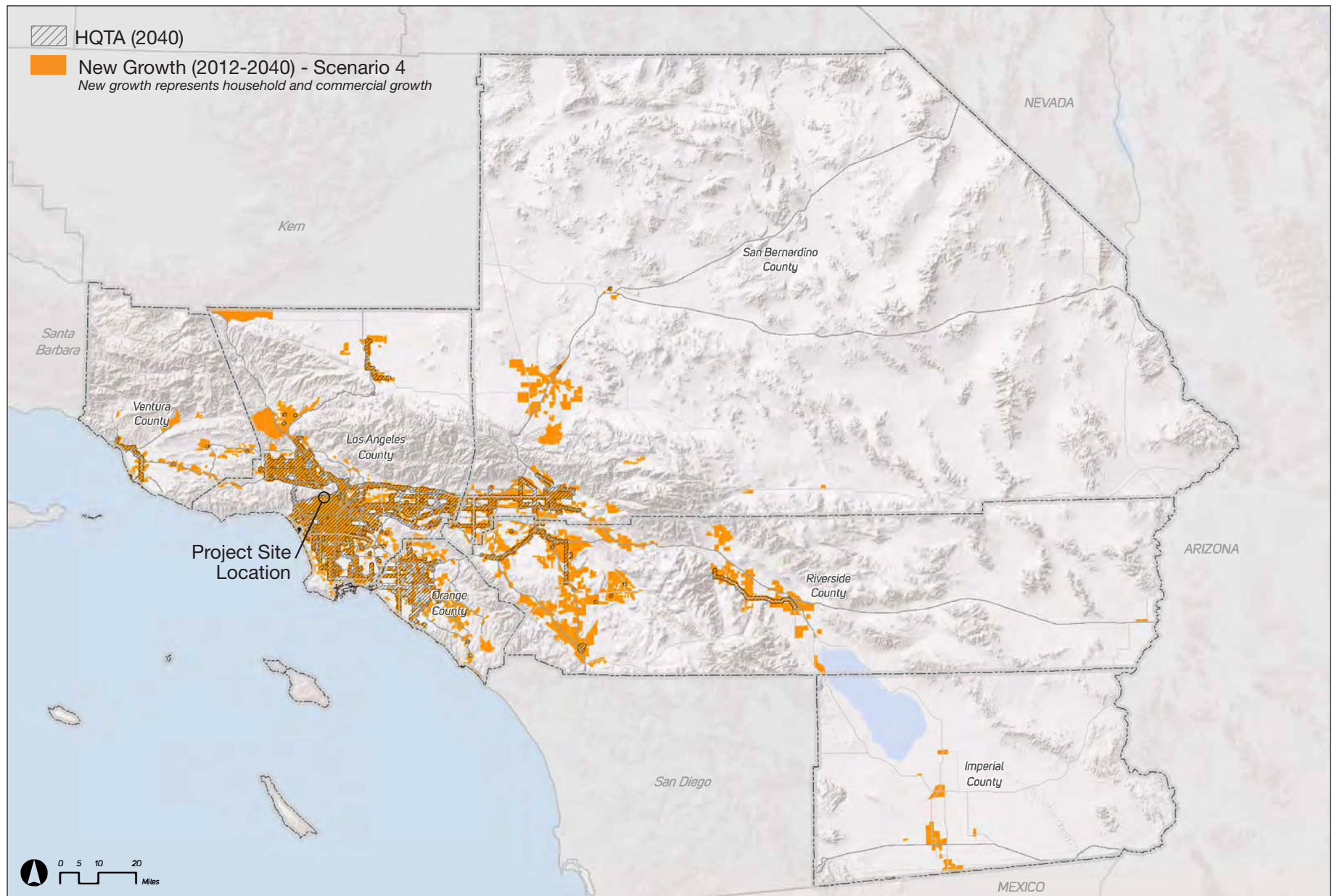
Figure 3
 SCAG Exhibit 36 – New Growth (2012-2040) – Scenario 2



SOURCE: SCAG, 2015

Hollywood Center Project

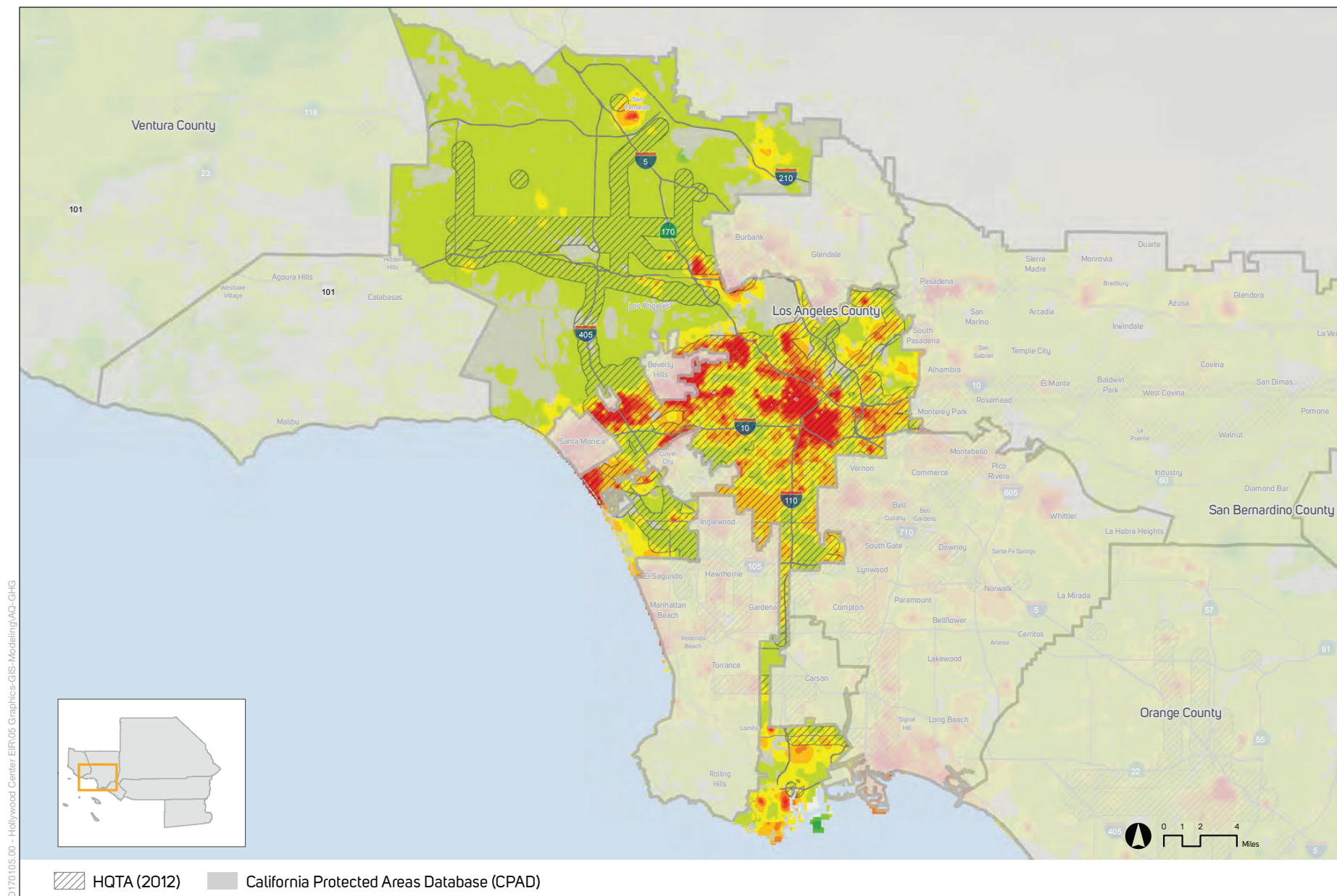
Figure 4
SCAG Exhibit 37 – New Growth (2012-2040) – Scenario 3



SOURCE: SCAG, 2015

Hollywood Center Project

Figure 5
SCAG Exhibit 38 – New Growth (2012-2040) – Scenario 4



SOURCE: SCAG, 2015

Hollywood Center Project

Figure 6
SCAG Exhibit 13 - Forecasted Regional Development Types by
Land Development Categories (2012) - Los Angeles City Subregion

