

III. Revisions, Clarifications, and Corrections to the Draft EIR

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This section of the Final EIR provides revisions, clarifications, and corrections to the Draft EIR that have been made to revise, clarify, or correct the environmental impact analysis for the Sunset + Wilcox Project (Project) pursuant to CEQA Guidelines Section 15132(a). For the reasons set forth in Section III.C, below, the revisions, clarifications, and corrections described in this section do not result in any “new significant information” or any new or increased significant environmental impacts associated with the Project pursuant to CEQA Guidelines Section 15088.5, and merely clarify, amplify, or refine information in the Draft EIR.

This section is divided into three parts: Section III.A, General Corrections and Additions to the Draft EIR; Section III.B, Corrections and Additions to Draft EIR Sections and Appendices; and Section III.C, Effect of Corrections and Revisions.

A. General Corrections and Additions to the Draft EIR

1. Design Refinements

The Applicant has proposed refinements to the Project in response to comments provided by the City’s Professional Volunteer Program (PVP), which is a design review program organized by AIA LA and the City’s Urban Design Studio. Specifically, the design materials proposed along the podium level were slightly modified from “distinctive, softly luminous material and wood screens” (page II-10 of the Draft EIR) to warm-colored, solid material elements alternating with clear and frosted panels that would wrap the podium level. In addition, the design and materials of the top two office floors and mechanical space that were previously surrounded with a mass timber structure framing the perimeter walkway on the 14th floor have also been modified. The screen for the mechanical equipment is now proposed to be a composition of a clear and frosted material, held in a steel frame. The patterning of the clear material would reflect the material and design of the podium and would tie the overall composition of the building together. Refer to Revised Figure II-5 and Revised Figure II-6 on pages III-3 and III-4 for a depiction of the proposed design materials.

Provided below is an example revision of the proposed change that applies to the entirety of the Draft EIR. The following text is included in Volume 1, Section II, Project Description, Subsection 4.b, Design and Architecture, page II-10. Revise as follows:

As illustrated in Figure II-5 on page II-11, the proposed commercial building would incorporate design elements consistent with other surrounding buildings in Hollywood and would feature a contemporary glass façade with various repeating rectangle forms, creating a distinctive character. The building would be designed with landscaped private terraces throughout. To enhance pedestrian activity, the ground floor of the building would include restaurant spaces along the Sunset Boulevard frontage. Also included within the ground floor would be office space, a lobby, ground floor parking, and a loading dock. Above the ground floor would be a podium composed of two above-grade parking levels as well as two floors of office space. The two above-grade parking levels would be fully-enclosed and mechanically ventilated. The podium would be wrapped in ~~a distinctive, softly luminous material and wood screens,~~ warm-colored, solid material elements alternating with clear and frosted panels, reducing the visibility of the parked cars from the street. The levels above the parking podium would include office spaces and would be designed with partially landscaped terraced levels. As shown in Figure II-5 and in Figure II-6 on page II-12, the massing of the building would shift south beginning at level six where 22,020 square feet of landscaped open space surrounding the office space would be provided. The Project would also include a penthouse office suite on level 14 and the mechanical roof on level 15, which would both be treated as a distinctive design element and ~~may would include the use of timber on the exterior a~~ clear and frosted material which would reflect the material of the podium.

Additional design refinements include a slight modification to the Project's proposed signage along Sunset Boulevard, as depicted in Revised Figure II-5 on page III-3. Specifically, the single proposed digital (non-animated) wall sign along the Sunset Boulevard frontage has been replaced with an integrated wraparound wall sign at the corner of Sunset Boulevard and Cole Place. The sign face along Sunset Boulevard would remain as a digital (non-animated) wall sign, as described in Section II, Project Description, of the Draft EIR, page II-17, while the sign face along Cole Place would be a non-digital wall sign consistent with the LAMC and the Hollywood Signage Supplemental Use District. Moreover, the trellis feature along the Project's southern façade has been extended further east and west of the Project's podium level, as depicted in Revised Figure II-6 on page III-4.



Revised Figure II-5
Conceptual Rendering Looking Southeast



Revised Figure II-6
Conceptual Rendering Looking Northeast

Additionally, the number of vehicular parking spaces has been reduced from 1,291 to 1,179 vehicular parking spaces.

Provided below is an example revision of the proposed change that applies to the entirety of the Draft EIR. The following text is included in Volume 1, Section II, Project Description, Subsection 4.a, Project Overview, page II-8. Revise as follows:

The Project also includes a LADWP equipment area that would include electrical distribution equipment and emergency generators within the De Longpre Lot. Specifically, on the north side of the De Longpre Lot an approximately 18-foot-tall, 3,550-square-foot enclosure would be constructed to house electrical equipment, building life safety generator, tenant back-up generators, and switchgear with adjacent exterior LADWP transformer yard surrounded by a protective 8-foot high fence with landscaped enhancements. Emergency generators would be provided below grade. The area proposed for the LADWP equipment area would not constitute floor area as defined by LAMC Section 12.03. The Project would also include ~~1,291~~1,179 vehicular parking spaces and a total of 61,449 square feet of private open space.

Also, the Project would include the planting of two additional trees on-site, which would increase the total number of trees provided from 30 trees to 32 trees.

Provided below is an example revision of the proposed change that applies to the entirety of the Draft EIR. The following text is included in Volume 1, Section II, Project Description, Subsection 4.c, Open Space and Landscaping, page II-14. Revise as follows:

Based on the Tree Report included in Appendix A of this Draft EIR, the Project would not involve the removal of any trees considered protected under the City of Los Angeles Native Tree Protection Ordinance either within the Project Site or in the adjacent right-of-way (street trees).¹ To allow for development of the Project, four existing on-site trees (consisting of one Chinese elm tree and three crape myrtle trees) and 12 street trees in the adjacent right-of-way (consisting of 10 lemon bottlebrush trees and 2 Indian laurel fig trees) would be removed. Pursuant to the requirements of the City

¹ Native species of oak (*Quercus* sp., except scrub oak [*Q. dumosa*]), Southern California black walnut (*Juglans californica*), California bay laurel (*Umbellularia californica*) and western sycamore (*Platanus racemosa*) trees at least 4 inches in diameter (cumulative for multi-trunked trees) at 4.5 feet above the ground level at the base of the tree or diameter-at-breast height (DBH) are protected in the City under Ordinance No. 177,404, which became effective April 23, 2006. On December 11, 2020, the City adopted Ordinance No. 186,873, extending protection status to include two native shrub species, the Mexican Elderberry (*Sambucus mexicana*) and toyon (*Heteromeles arbutifolia*) shrubs.

of Los Angeles Urban Forestry Division and subject to approval of the Board of Public Works, the on-site trees to be removed would be replaced at a 1:1 ratio, and the street trees to be removed would be replaced at a 2:1 basis. Replacement trees would include native, drought-tolerant tree species. Overall, the Project would include ~~30~~32 trees, including 24 new streets trees.

2. Requested Permits and Approvals

The list of the anticipated requests for approval of the Project provided throughout the Draft EIR is modified to include Project Permit Compliance Review with the Hollywood Signage District. Specifically, the Project would require a Project Permit Compliance Review with the Hollywood Signage District Pursuant to LAMC Section 11.5.14-D.

Provided below is an example revision of the proposed change that applies to the entirety of the Draft EIR. The following text is included in Volume 1, Section II, Project Description, Subsection 5, Requested Permits and Approvals, page II-18 through page II-19. Revise as follows

- Pursuant to LAMC Section 12.32-F, a Height District Change for the Project Site to change the Project Site's Height Districts No. 1XL and No. 2D to No. 2;
- Pursuant to LAMC Sections 12.24-W.1 a Main Conditional Use Permit for the sale and dispensing of alcoholic beverages for on-site and off-site consumption for up to three restaurants;
- Pursuant to LAMC Section 16.05, a Site Plan Review for a development that results in an increase of 50,000 square feet or more of non-residential floor area or generates more than 1,000 average daily trips;
- Pursuant to LAMC Section 17.15 and 17.03, a Vesting Tentative Tract Map No. 83088 merge and re-subdivide the Project Site to create two ground lots and 12 airspace lots, merge a 2,275 square-foot portion of Wilcox Avenue into the Project Site, and request to remove the 5-foot dedication along the entire alley abutting the lot with APN 5546-014-014 and remove a 5-foot dedication along the alley abutting the lot with APN 5546-014-017;
- Pursuant to LAMC Section 11.5.14-D, Project Permit Compliance Review with the Hollywood Signage District; and
- Other discretionary and ministerial permits and approvals that are or may be required, including, but not limited to, temporary street closure permits, grading permits, excavation permits, haul route

approval, street tree removal approval, foundation permits, and sign permits.

B. Corrections and Additions to Draft EIR Sections and Appendices

Additional changes have been made to the Draft EIR to revise, clarify, or correct the environmental impact analysis for the Project. Deletions are shown in ~~striketrough text~~ and additions are shown in underlined text. Such changes are presented by EIR section.

I. Executive Summary

No additional corrections or additions beyond the general corrections described above have been made to this section of the Draft EIR.

II. Project Description

No additional corrections or additions beyond the general corrections described above have been made to this section of the Draft EIR.

IV.A. Air Quality

Volume 1, Section IV.A, Air Quality, page IV.A-63, replace Table IV.A-9 with Revised Table IV.A-9 as provided on page III-8.

Revised Table IV.A-9
Estimate of Maximum Mitigated Regional Project Daily Construction Emissions (pounds per day)

Construction Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Regional Construction Emissions						
2023	4	57	125	<1	10	3
2024	5	40	63	<1	6	3
2025	38	46	76	<1	7	3
Maximum Unmitigated Mitigated Construction Emissions^a	38	57	125	<1	10	3
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(37)	(43)	(425)	(150)	(140)	(52)
Maximum Unmitigated Mitigated Construction Emissions Exceed Threshold?	No	No	No	No	No	No
<p>Numbers may not add up exactly due to rounding.</p> <p>^a The CalEEMod model printout sheets and/or calculation worksheets are presented in Appendix B (CalEEMod Output) of this Draft EIR.</p> <p>Source: Eyestone Environmental, 2021.</p>						

Volume 1, Section IV.A, Air Quality, page IV.A-68 through page IV.A-69, Subsection 3.e.(1), Cumulative Impacts Analysis, revise paragraph as follows:

As discussed above under Thresholds (b) and (c)—~~above~~, the Project's ~~construction-related and operational-related~~ regional air quality emissions, ~~and localized emissions, and emissions of TACs~~ would be less than significant with implementation of Mitigation Measure AIR-MM-1. The Project's construction-related emissions of TACs would be less than significant, and no mitigation measures are required. The Project's operational-related air quality emissions would also be less than significant, and no mitigation measures are required. Based on SCAQMD guidance, individual projects that exceed SCAQMD's 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.² However, those projects that do not exceed the thresholds would not be cumulatively considerable. Therefore, since the Project would not exceed the construction-related thresholds for air quality pollutants with implementation

² SCAQMD, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, Appendix D, August 2003.

of Mitigation Measure AIR-MM-1 and would not exceed the operation-related thresholds for air quality pollutants, the Project's contribution to cumulative air quality impacts would not be cumulatively considerable. **As such, during construction and operation, the Project's contribution to air quality impacts would not be cumulatively considerable, and, therefore, the Project would have a less-than-significant cumulative impact to regional air quality.**

IV.B. Cultural Resources

No corrections or additions beyond the general corrections described above have been made to this section of the Draft EIR.

IV.C. Energy

No corrections or additions have been made to this section of the Draft EIR.

IV.D. Greenhouse Gas Emissions

No corrections or additions have been made to this section of the Draft EIR.

IV.E. Land Use and Planning

No corrections or additions beyond the general corrections described above have been made to this section of the Draft EIR.

IV.F. Noise

Volume 1, Section IV.F, Noise, page IV.F-58 through page IV.F-59, Threshold (c), revise paragraph as follows:

As evaluated in the Initial Study prepared for the Project, included as Appendix A of this Draft EIR, and Section VI, Other CEQA Considerations, of this Draft EIR, the Project Site is not located within the vicinity of a private airstrip or an airport land use plan or within two miles of an airport. Thus, the Project would not expose people residing or working in the project area to excessive airport-related noise levels. The nearest airport is the Hollywood-Burbank Airport located approximately 6.75 miles northeast of the Project Site. Since the Project is not located within an airport land use plan, within 2 miles of a public airport or public use airport, or within the vicinity of a private airstrip, impacts with regard to airport-related noise would not occur.

Therefore, as determined in the Initial Study, no impacts with respect to Threshold (c) would occur, and no further analysis is required.

IV.G.1 Public Services—Fire Protection

No corrections or additions have been made to this section of the Draft EIR.

IV.G.2 Public Services—Police Protection

No corrections or additions have been made to this section of the Draft EIR.

IV.G.3 Public Services—Libraries

No corrections or additions have been made to this section of the Draft EIR.

IV.H. Transportation

No corrections or additions beyond the general corrections described above have been made to this section of the Draft EIR.

IV.I. Tribal Cultural Resources

No corrections or additions have been made to this section of the Draft EIR.

IV.J.1 Utilities and Service Systems—Water Supply and Infrastructure

No corrections or additions have been made to this section of the Draft EIR.

IV.J.2 Utilities and Service Systems—Wastewater

No corrections or additions have been made to this section of the Draft EIR.

IV.J.3 Utilities and Service Systems—Energy Infrastructure

No corrections or additions have been made to this section of the Draft EIR.

V. Alternatives

No corrections or additions beyond the general corrections described above have been made to this section of the Draft EIR.

VI. Other CEQA Considerations

Volume 1, Section VI, Other CEQA Considerations, page VI-31, Subsection 6, Effects Not Found to Be Significant, add new subsection o. Utilities and Service Systems—Telecommunications Facilities as follows:

o. Utilities and Service Systems— Telecommunications Facilities

As stated on page 79 of the Initial Study included in Appendix A of this Draft EIR, the Project would require installation of new on-site telecommunication facilities to service the Project and potential upgrade or relocation of existing telecommunication facilities primarily to underground the telecommunication lines. As the Project would comply with all regulations regarding on- and off-site telecommunication facilities, the off-site construction work would be of a short duration, Project Design Feature TR-PDF-1 (CTMP) would ensure safe pedestrian, vehicular and emergency access during construction, and the construction would be coordinated with the service providers and the City, the Project would not require or result in the relocation or construction of new or expanded telecommunications facilities, the construction or relocation of which could cause significant environmental effects. As such, the Project's contribution to impacts related to telecommunication infrastructure would not be cumulatively considerable. Therefore, Project-level and cumulative impacts related to telecommunication infrastructure would be less than significant.

Volume 1, Section VI, Other CEQA Considerations, page VI-31 through page VI-32, Subsection 6, Effects Not Found to Be Significant, renumber subsections o and p to p and q, respectively.

Appendices

No corrections or additions have been made to the appendices of the Draft EIR.

C. Effect of Corrections and Revisions

CEQA Guidelines Section 15088.5 requires that an EIR which has been made available for public review, but not yet certified, be recirculated whenever significant new information has been added to the EIR. The entire document need not be circulated if revisions are limited to specific portions of the document.

The relevant portions of CEQA Guidelines Section 15088.5 read as follows:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:*
- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.*
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)*

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The information contained in this section of the Final EIR clarifies, amplifies, or refines information in the Draft EIR but does not make any changes that would meet the definition of “significant new information” as defined above. The information added to the Draft EIR does not change the Draft EIR in a way that deprives the public of a meaningful opportunity to comment upon a new or substantially increased significant environmental effect of the Project or disclose a feasible alternative or mitigation measure the Applicant has declined to adopt. As provided by the discussion below, the revisions, clarifications, and corrections to the Draft EIR would not result in new significant impacts or increase any impact already identified in the Draft EIR.

With respect to the proposed refinement regarding the material and trellis feature to be used along the podium level as well as reduction in parking, the planting of two additional trees, and the replacement of the signage, these proposed refinements would not result in significant new impacts or increased impacts as these proposed modifications merely clarify and further define the design of the Project. In addition, the corrections to Section IV.A, Air Quality, IV.F, Noise, and VI, Other CEQA Considerations provided above are limited to typographical errors and minor revisions. In particular, the added text in Section VI, Other CEQA Considerations, is merely a summary of the analysis previously included in the Initial Study included in Appendix A of the Draft EIR. It does not constitute new information. Furthermore, the addition of the Project Permit Compliance Review with the Hollywood Signage District Pursuant to LAMC Section 11.5.14-D to the list of anticipated entitlements was merely an omission. The proposed signage associated with this request was described in Section II, Project Description, of the Draft EIR, page II-17. Specifically, as described therein, the Project would include one digital (non-animated) wall sign along the Sunset Boulevard frontage, which would fit within the permitted area as well as the permitted sign location pursuant to the LAMC and the Hollywood Signage Supplemental Use District. Overall, these additions and corrections would not result in new significant impacts or increase the impacts of the Project.

Based on the above, the revisions, clarifications, and corrections to the Draft EIR and the modifications to the Project do not result in any new significant impacts or a substantial increase in an impact already identified in the Draft EIR or disclose a feasible alternative or mitigation measure the Applicant has declined to adopt. The revisions to the Draft EIR clarify, amplify, or refine the information in the Draft EIR. Thus, none of the conditions in Section 15088.5 of the CEQA Guidelines are met and recirculation of the Draft EIR is not required.