LOS ANGELES
DEPARTMENT OF CITY
PLANNING
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Los Angeles, CA 90012

ADDENDUM

SunWest Project

Case Number: ENV-2015-2448-EIR
State Clearinghouse: 2015091003

Project Location: 5509-5529 W. Sunset Boulevard; 1505-1535 N. Western Avenue; and 5518 W. Harold Way, Los Angeles, California, 90028

Community Plan Area: Hollywood

Council District: 13 – O'Farrell

Revised Project Description: The SunWest Project included the demolition and removal of an existing commercial building and associated surface parking and the subsequent development of a six-story mixed-use building, with five stories of residential uses to be located above ground-floor commercial uses, podium parking levels, and two levels of subterranean parking, on a 2.22-acre site (Approved Project). Modifications to the Approved Project include: increasing the amount of ground-floor commercial uses from 33,980 to 35,694 square feet; increasing the total number of residential dwelling units from 293 to 412 units; increasing the number of Very Low Income Restricted Affordable housing units from 25 to 61 units; increasing the building height from six to seven stories and from 80 to 95 feet; and increasing the number of levels of subterranean parking from two to three levels (Revised Project).

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

CAJA Environmental Services, LLC

APPLICANT

Metropolitan View Properties, LP

May 2020

1 INTRODUCTION

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the SunWest Project (Case No. ENV-2015-2448-EIR, State Clearinghouse No. 2015091003), which was certified by the City of Los Angeles (City) on May 3, 2018 (Certified EIR). In accordance with the California Environmental Quality Act (CEQA), this Addendum to the EIR analyzes proposed modifications (the Revised Project) to the SunWest Project approved in 2018 (the Approved Project) and demonstrates that all of the potential environmental impacts associated with the proposed modifications would be within the envelope of impacts already evaluated in the Certified EIR.

1.1 BACKGROUND

The City of Los Angeles (City) prepared an EIR pursuant to CEQA for the SunWest Project (Project) to assess potential environmental impacts of the Project, as described below. The EIR is comprised of two parts, the Draft EIR and the Final EIR. A Draft EIR was made available and circulated for public review and comment, pursuant to the provisions of CEQA, for a 46-day public review period from October 20, 2016 to December 5, 2016.[1] The Final EIR was released on January 26, 2018, and included responses to comments and text revisions to the Draft EIR based on input received.[2] The EIR concluded that with mitigation, all of the Project's environmental impacts would be less than significant, with the exception of a significant and unavoidable environmental impacts related to neighborhood traffic intrusion.

In May 2018, the City adopted the EIR and approved the Project. Subsequent to approval of the Project, the Project Applicant has revised the project (Revised Project). Both the Approved Project (as analyzed in the Draft and Final EIR) and the Revised Project (analyzed in this Addendum) are discussed further below.

1.2 CEQA AUTHORITY FOR AN ADDENDUM

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

> *The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

Section 15162 of the CEQA Guidelines requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project and one or more of the following circumstances exist:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

1 https://planning.lacity.org/eir/sunwest/DEIR/DEIR%20SunWest%20Project.html

2 https://planning.lacity.org/eir/SunWest/FEIR/FEIR%20SunWest%20Project.html

2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no Supplemental or Subsequent EIR shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project which will require major revisions of the environmental impact report;
- Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or
- New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis in this document, the Revised Project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Rather, all of the impacts associated with the Revised Project are within the envelope of impacts addressed in the Certified EIR and do not constitute a new or substantially increased significant impact. Therefore, the modifications resulting from the Revised Project do not meet the standards for a Supplemental or Subsequent EIR pursuant to CEQA Guidelines Section 15162.

2 PROJECT DESCRIPTION

2.1 PROJECT SUMMARY

2.1.1 Overview of Approved Project

The Approved Project, as analyzed in the EIR, included a proposed mixed-use development including five stories of residential apartments above a podium level, 33,980 square feet of general commercial land uses (including 32,990 square feet of ground-floor retail and a 990-square-foot leasing office), and two levels of subterranean parking. The Project included 293 dwelling units (105 studios, 110 1-bedroom units, and 78 2-bedroom units). Of the 293 dwelling units, 25 units would be Very Low Income Restricted Affordable housing units.[3] The maximum height of the building would reach approximately 80 feet.

2.1.2 Modifications to Approved Project

This section is based on the following item, which is included as **Appendix A** to this Addendum:

A Plans, Withee Malcolm Architects, April 14, 2020.

Since adoption of the EIR and approval of the Project, the Project Applicant has made some changes to the Project. The changes to the Project include an increase in dwelling units and an overall increase in the commercial square footage.

The Revised Project, as analyzed in this Addendum, includes a proposed mixed-use development including six stories of residential apartments above a podium level, 35,694 square feet of general commercial land uses (including 23,940 square feet of ground-floor market, 10,564 square-foot retail/restaurant, and a 1,190-square-foot leasing office), and three levels of subterranean parking. The Project includes 412 dwelling units (176 studios, 163 1-bedroom units, and 73 2-bedroom units). Of the 412 dwelling units, 61 units would be Very Low Income Restricted Affordable housing units. The maximum height of the building would reach approximately 95 feet.

The Revised Project would provide an additional 86 parking spaces and would excavate an additional level of subterranean parking for a total of three subterranean levels. In addition, the Project would export an additional 96,730 cubic yards of soil. The development would construct an additional 119 dwelling units with additional commensurate floor area as compared to the Approved Project. The Revised Project would extend the Approved Project's construction schedule by approximately eight months. Specifically, the grading phase would be extended by approximately five months, and construction activities would take place six days a week, rather than the original five days a week assumed for the Approved Project. The building construction and architectural coatings phases would not extend in duration, but their related construction activities would also take place six days a week, rather than the original five days a week assumed for the Approved Project. Unlike for the Approved Project, no overlap of construction phases is anticipated or required. As such, the construction and operation modeling has been updated for the Revised Project.

[3] Per the Department of City Planning's Determination Letter dated May 4, 2018 for Case No. ZA-2015-2903-MCUP-SPP-SPPA-DB-SPR, the Approved Project included 25 units set aside for Very Low Income Households.

Access for the Revised Project would not change as compared to the Approved Project. There would be two proposed driveways on Sunset Boulevard and two proposed driveways on Harold Way. The driveway operations would not change. The Sunset eastern driveway has shifted 18 feet to the west (from 132 feet to 150 feet from Western Avenue). No other change has occurred. The driveways will comply with the Station Neighborhood Area Plan (SNAP) and LADOT requirements.

The Revised Project would have similar massing as the Approved Project, although it would be 15 feet taller in building height. The orientation of the building, including commercial space locations and building entrances would be the same. The Revised Project would include additional energy and water conservation features as compared to the Approved Project since it would be subject to the latest City and State building codes, which result in greater building efficiencies than previous code versions.

Table 1-1 includes a comparison of the characteristics of the Approved Project analyzed in the EIR and the Revised Project addressed in this Addendum.

Table 1-1
Project Comparison

Characteristics	Approved Project[1]	Revised Project[2]	Change
Residential Dwelling Units (total) - Market Rate - Very Low Income households	293 du (total) 268 du 25 du [3]	412 du (total) 351 du 61 du	+ 119 du (total) + 83 du + 36 du
Commercial Uses (total) - Grocery Store - Retail/Restaurant - Leasing Office	33,980 sf (total) 25,090 sf 7,900 sf 990 sf	35,694 sf (total) 23,940 sf 10,564 sf 1,190 sf	+ 1,714 sf (total) - 1,150 sf + 2,664 sf + 200 sf
Floor Area (FAR)	319,664 (3.3:1)	431,963 sf (4.46:1)	+ 112,299 (+1.16)
Open Space	38,749 sf	45,338 sf	+ 6,589 sf
Parking Space	573 spaces	659 spaces	+ 86 spaces
Height	80 feet	95 feet	+ 15 feet

du = dwelling unit; sf = square feet
[1] Draft EIR Project Description and Traffic Impact Analysis, Overland Traffic Consultants, December 2015.
[2] Addendum's Traffic Impact Analysis, Overland Traffic Consultants, June 13, 2019.
[3] Per the Department of City Planning's Determination Letter dated May 4, 2018 for Case No. ZA-2015-2903-MCUP-SPP-SPPA-DB-SPR, the Approved Project included 25 units set aside for Very Low Income Households.
Plans, Withee Malcolm Architects, April 14, 2020.

2.2 ENVIRONMENTAL SETTING

2.2.1 Project Location

The Project site is located in the Hollywood Community Plan Area of the City of Los Angeles (City). Specifically, the 2.22-acre Project Site is bound by Harold Way to the north, Western Avenue to the east, Sunset Boulevard to the south, and commercial and residential land uses to the west.

2.2.2 Existing Conditions

The Project Site's net lot area is 96,868 square feet[4] (or 2.22 acres). The Assessor Parcel Number (APN) for the Project Site is 5544-023-023. The existing land use designation in the adopted Hollywood Community Plan for the Project site is Highway Oriented Commercial. The Site is zoned C2-1 (Commercial Zone, Height District 1) The Project Site also falls within the boundaries of the Vermont/Western Transit Oriented District Specific Plan and the Station Neighborhood Area Plan (SNAP), the Hollywood Redevelopment Project area, and Los Angeles State Enterprise Zone (which allows for parking reductions). The Site is currently developed with a 26,457 square foot retail building and 105-space parking lot, both of which are proposed to be removed.

2.2.3 Surrounding Uses

The Project Site is located within the commercial/retail corridor along Sunset Boulevard. Land uses in the immediate Project site area include multi-family residential to the north; a mix of multi-family residential and commercial to the west; commercial to the south; and commercial, hotel, and multi-family residential to the east. The Project Site is approximately 775 feet (less that one-quarter mile) from the Metro B Line (Red)[5] Hollywood/Western train station located northeast of the Project site on Hollywood Boulevard.

As part of the updated traffic analysis, an updated list of Related Projects was obtained from the Los Angeles Department of City Planning and Los Angeles Department of Transportation. The list and map can be found in Appendix G-1, Transportation Impact Study, of this Addendum. The list expanded from 127 to 130 Related Projects, including the newly added nearby mixed use (735 apartment units, 60,000 square feet of market, 33,500 square feet of restaurant) project at 5420 Sunset Boulevard (#30). The 194,749 square feet of retail at 5520 Sunset Boulevard (#97) remains the same. The updated Related Projects were considered in the new analysis.

2.3 DISCRETIONARY REQUESTS FOR THE REVISED PROJECT

The list below includes the anticipated requests for approval of the Revised Project.

1. Pursuant to **LAMC Section 12.24 U.26**, a **Conditional Use Permit** to allow a density increase greater than the maximum permitted per LAMC Section 12.22 A.25, or for 70 percent over the entire Project Site, in order to permit 412 dwelling units in lieu of 329 units, in exchange for setting aside 25 percent of the base density, or 61 units, as Restricted Affordable units at a Very Low Income level.

2. Pursuant to **LAMC Section 12.22 A.25**, a 35 percent Density Bonus, in exchange for setting aside 25 percent of the base permitted density, or 61 units, for Very Low Income households, in conjunction with Parking Option 1 and the following Off-Menu Incentives:

   (a) A Floor Area Ratio (FAR) of 4.5:1 in lieu of the otherwise maximum permitted FAR of 3:1 permitted for a mixed-use project within Subarea C (Community Center) of the

4 Plans, Withee Malcolm Architects, April 14, 2020.

5 In January 2020, Metro renamed its rail line, and currently has a transitional naming system using both the letter and the color: https://thesource.metro.net/2020/01/08/get-to-know-your-line-letters/

Vermont/Western Station Neighborhood Area Plan Transit Oriented District (SNAP) Specific Plan.

(b) Elimination of the East/West pedestrian throughway required per Subarea C (Community Center) of the Vermont/Western SNAP Specific Plan.

(c) A building height of 95 feet in lieu of the otherwise maximum permitted height of 75 feet for mixed-use projects within Subarea C (Community Center) of the Vermont/Western SNAP Specific Plan.

3. Pursuant to **LAMC Section 11.5.7 F,** a **Specific Plan Exception** from Section 9.E.3 of the Vermont/Western SNAP Specific Plan to permit 169 commercial parking spaces in lieu of the otherwise permitted maximum of 71 commercial parking spaces.

4. Pursuant to **LAMC Section 11.5.7 C**, a **Project Permit Compliance Review** for the demolition of an existing commercial/retail building with surface parking, and the construction, use, and maintenance of a mixed-use commercial and residential building, a maximum of 95 feet in height, with a maximum of 35,694 square feet of commercial floor area and 412 dwelling units within Subarea C (Community Center) of the Vermont/Western SNAP Specific Plan.

5. Pursuant to **LAMC Section 12.21 G.3**, a Director's Decision to permit the planting of 72 on-site trees, in lieu of the otherwise required 103 on-site trees, in conjunction with the payment of an in-lieu fee for the remaining required 31 on-site trees, in accordance with Ordinance No. 185573.

6. Pursuant to **LAMC Section 16.05**, a **Site Plan Review** for the demolition of an existing commercial/retail building with surface parking, and the construction, use, and maintenance of a mixed-use commercial and residential building, comprised of 412 dwelling units, a maximum of 35,694 square feet of commercial floor area, with a maximum height of 95 feet.

7. Pursuant to **LAMC Section 12.24 W.1**, a **Master Conditional Use Permit** to allow for the sale and dispensing of a full-line of alcoholic beverages for on-site consumption at two restaurant establishments, and off-site sale at one grocery store establishment.

3 REVISIONS TO CEQA GUIDELINES

3.1 INTRODUCTION

The California Natural Resources Agency adopted revisions to the CEQA Guidelines that became effective on December 28, 2018, which was after preparation of the EIR. The revisions to the CEQA Guidelines were adopted largely to create efficiencies and to align the CEQA Guidelines with California appellate court and Supreme Court decisions. The revisions that are most applicable to the EIR are those associated with changes to Appendix G.

Appendix G of the CEQA Guidelines contains a sample initial study format. The purpose of an initial study is to assist lead agencies in determining whether a project may cause a significant impact on the environment. To help guide that determination, Appendix G asks a series of questions in the form of a checklist regarding a range of environmental resources and potential impacts. The City uses Appendix G in their EIRs to demonstrate that a project would not result in significant impacts on the environment that cannot be mitigated.

When the Appendix G checklist was originally developed, it contained only a handful of questions. Over time, the list of questions has grown in response to increasing awareness of the effects of development on the environment. Currently, the sample checklist contains 89 questions divided into 18 categories of potential impacts. The California Natural Resources Agency recently revised Appendix G in several ways. First, it reframed or deleted certain questions that should be addressed in the planning process to focus attention on those issues that must be addressed in the CEQA process. Second, it added questions that, although required by current law, tend to be overlooked in the environmental review process. Finally, it revised the questions related to transportation impacts and wildfire risk as required by Senate Bill (SB) 743 and SB 1241, respectively, and relocated questions related to paleontological resources as required by Assembly Bill (AB) 52, as well as deleted or consolidated numerous questions from the Appendix G checklist.

3.2 MODIFICATIONS TO APPENDIX G OF THE CEQA GUIDELINES

The revisions to Appendix G were adopted largely to reduce redundancy, provide additional clarity and to align Appendix G with California appellate court and Supreme Court decisions and changes to the Public Resources Code. An overview of the modifications to the Appendix G is provided below by environmental topic. Based on the discussion below, while Appendix G was modified, the modified Appendix G questions that would apply to the Project have been addressed within the Approved EIR, including within the Initial Study, provided as Appendix A1 of the Draft EIR.

3.2.1 Aesthetics

Consistent with SB 743, the modifications clarify that the checklist questions regarding aesthetics do not apply to projects that are located in a transit priority area and are defined as set forth in Public Resources Code Section 21099. Per SB 743, aesthetics impacts for such projects are less than significant. For those projects that do not meet the definition provided in Public Resources Code Section 21099, the modifications provide distinct checklist questions for

public views and consistency with zoning regulations governing scenic views , depending upon whether the Project is within a non-urbanized or urbanized area. As discussed in detail in the Draft EIR, the Project meets the definition of Public Resources Code Section 21099 and as such, aesthetic impacts associated with the Project are less than significant. All of the checklist questions as presented in the updated Appendix G checklist are addressed in the Initial Study, included as Appendix A1 of the Draft EIR.

3.2.2 Agriculture and Forestry Resources

These checklist questions were not updated as part of the modifications and are responded to in the Initial Study, included as Appendix A1 of the Draft EIR.

3.2.3 Air Quality

These checklist questions were modified to delete Checklist Question III.b regarding violation of air quality standards and to modify the question regarding odors. All of the checklist questions as presented in the updated Appendix G checklist are addressed in Section IV.B, Air Quality, of the Draft EIR.

3.2.4 Biological Resources

Checklist Question IV.c has been modified to remove the reference to Section 404 of the Clean Water Act. This modification does not affect the analysis of biological resources provided in the Initial Study included in Appendix A1 of the Draft EIR.

3.2.5 Cultural Resources

These modifications consist of a minor word change to Checklist Question V.a and moving Checklist Question V.c regarding paleontological resources from the Cultural Resources subsection to the Geology and Soils subsection of Appendix G. Impacts to cultural resources are provided in the Initial Study included in Appendix A1 of the Draft EIR.

3.2.6 Energy

The modifications include energy as a separate subsection and incorporates language from Appendix F of the CEQA Guidelines. These added checklist questions have already been addressed in Section IV.L.4, Energy, of the Draft EIR.

3.2.7 Geology and Soils

These checklist questions have been modified to focus on both the direct and indirect impacts associated with geology and soils and to move the analysis of paleontological resources to this topic from the Cultural Resources subsection. Impacts to geology and soils are fully addressed in Section IV.C, Geology and Soils, of the Draft EIR.

3.2.8 Greenhouse Gas Emissions

These checklist questions were not changed as part of the modifications and are addressed in Section IV.D, Greenhouse Gas Emissions, of the Draft EIR.

3.2.9 Hazards and Hazardous Materials

These checklist questions were revised to delete Checklist Question VIII.f regarding safety hazards associated with proximity to a private airstrip and to clarify that Checklist Question VIII.g (formerly Checklist Question VIII.h) includes both direct or indirect impacts associated with wildland fires. All of the checklist questions as presented in the updated Appendix G checklist

are addressed in Section IV.E, Hazards and Hazardous Materials, of the Draft EIR and wildland fires are discussed in the Initial Study, included as Appendix A1 of the Draft EIR.

3.2.10 Hydrology and Water Quality

These checklist questions were revised to provide clarification and eliminate redundancy. All of the topics in these checklist questions, including those related to water quality, groundwater, flooding, and flood hazards, are thoroughly addressed in Section IV.F, Hydrology and Water Quality, of the Draft EIR.

3.2.11 Land Use and Planning

Checklist Question X.b has been revised to focus on conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Checklist Question X.c has been deleted, as it addressed habitat conservation plans, which are already addressed under the biological resources checklist questions. A detailed analysis of the Project's consistency with land use plans, policies, and regulations is provided in Section IV.G, Land Use, of the Draft EIR.

3.2.12 Mineral Resources

These questions were not updated as part of the modifications and are responded to in the Initial Study included as Appendix A1 of the Draft EIR.

3.2.13 Noise

Checklist Questions XII.a and XII.b were revised to focus on impacts associated with the generation of noise and vibration noise levels. In addition, Checklist Questions XII.c, XII.d, and XII.f were deleted, as they were redundant, and Checklist Question XII.e was revised accordingly. The topics associated with these modified questions are fully addressed in Section IV.H, Noise, of the Draft EIR.

3.2.14 Population and Housing

Checklist Question XIII.a was clarified to focus on potential impacts associated with unplanned growth, and Checklist Questions XIII.b and XIII.c were combined. The topics in these modified questions are fully addressed in Section IV.I, Population, Housing, and Employment, of the Draft EIR.

3.2.15 Public Services

These checklist questions were not updated as part of the modifications and are responded to in Sections IV.J.1, Public Services—Fire Protection, through IV.J.5, Public Services—Libraries, of the Draft EIR.

3.2.16 Recreation

These questions were not updated as part of the modifications and are responded to in Section IV.J.4, Pubic Services—Parks, of the Draft EIR.

3.2.17 Transportation

Checklist Questions XVI.a and XVI.f were combined and clarified to focus on conflicts with a program, plan, ordinance, or policy addressing the circulation system. Checklist Question XVI.c regarding airport traffic safety was eliminated, as airport traffic safety is already addressed under the hazards questions. Former Checklist Question XVI.d (now Checklist Question XVI.c)

was revised to add “geometric” for clarity. All of the topics in these questions were addressed as part of the analyses within Section IV.K, Transportation/Traffic, of the Draft EIR.

In addition, Checklist Question XVI.b was revised to address consistency with CEQA Guidelines Section 15064.3, subdivision (b), which relates to use of vehicle miles traveled (VMT) as the methodology for evaluating traffic impacts.

Previously, Checklist Question XVII.b referred to whether the Project would conflict with an applicable Congestion Management Plan (CMP). On August 28, 2019, Metro informed LADOT that the CMP no longer applies to any local jurisdiction. As such, provisions of CMP no longer apply and are not included in the analysis.

While Appendix G was revised to incorporate Section 15064.3, Section 15064.3 does not become applicable statewide until July 1, 2020. Until that time, pursuant to Section 15064.3(c), agencies are not required to use VMT as the basis for evaluation of traffic impacts and also may elect to use Section 15064.3 immediately. The City adopted a VMT methodology on July 30, 2019. During this transition, projects that already have a signed memorandum of understanding (MOU) with LADOT and have filed an application with DCP may continue analyzing transportation impacts with level of service (LOS), as long as the project will be adopted and through any appeal period prior to the State deadline of July 1, 2020. On April 17, 2020, LADOT issued a subsequent memo updating its VMT direction in response to the coronavirus pandemic. Due to delays in project hearing and decision dates, LADOT offers an extension to the July 1, 2020 deadline for applicants processing LOS-based analyses if it can be demonstrated that their projects were delayed from receiving their final entitlements because of the pandemic. Thus, at this time, traffic analyses within the City of Los Angeles for certain projects, including this project, may continue to be based on LADOT’s adopted methodology under its Transportation Impact Study Guidelines, which requires use of LOS to evaluate traffic impacts of a Project (consistent with Checklist Question XVII.b of the CEQA Guidelines prior to the latest update).

As with the checklist questions above, the previous Checklist Question XVII.b of Appendix G was addressed as part of the analyses within Section IV.K, Transportation and Traffic of the Draft EIR.

Nonetheless, an additional assessment using LADOT’s new CEQA Transportation Assessment Guidelines (TAG) including a calculation of the project’s VMT (vehicles miles traveled) metric was also conducted.

3.2.18 Tribal Cultural Resources

These checklist questions were not updated as part of the modifications and are responded to in Section III, Response to Comments, of the Final EIR. As stated in Response to Comment NAHC Comment 1, the Draft EIR preparation was initiated in October 2015, prior to the effective date of the changes to the State CEQA Guidelines, and was released October 2016, immediately after the effective date of changes. However, the City undertook and concluded tribal consultation meeting the requirements of AB52, and the results of this consultation process are included in Appendix B to the Final EIR. On July 8, 2015, as part of the preparation of the Draft EIR for the SunWest Project, a Sacred File and Native American Contacts List was requested from the NAHC. NAHC responded to the request in a letter dated August 11, 2015

and included a Native American Heritage Commission Tribal Consultation List. In accordance with AB 52, on July 27, 2015, letters were mailed to all of the contacts on the Tribal Consultation List provided by NAHC. None of these tribal contacts responded, and the City received no requests for consultation. The City determined that no substantial evidence exists to support a conclusion that the Project may cause a significant impact on tribal cultural resources. Therefore, the City has no basis under CEQA to impose any related mitigation measures for impacts to tribal cultural resources.

3.2.19 Utilities and Service Systems

These checklist questions were revised to reduce redundancy. Specifically, Checklist Question XVIII.a was eliminated, as wastewater treatment was already addressed in former Checklist Question XVIII.e (now Checklist Question XVIII.c). In addition, former Checklist Questions XVIII.b and XVIII.c were combined to address all infrastructure types in one question (now Checklist Question XVIII.a) and to include the addition of telecommunications. Former Checklist Question XVIII.d regarding water supply was also updated to clarify that the analysis of water supply should include reasonably foreseeable future development during normal, dry and multiple dry years. Former Checklist Questions XVIII.f and XVIII.g regarding solid waste impacts were also clarified.

With regard to telecommunications, the Project would require construction of new on-site telecommunications infrastructure to serve the new building and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. When considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution and minor off-site work associated with connections to the public system. Any work that may affect services to the existing telecommunications lines would be coordinated with service providers. In addition, on-site and off- site construction work associated with utilities was addressed within the Draft EIR. Installation of new telecommunications infrastructure would be within the scope of the construction impacts already analyzed in the Draft EIR and would be addressed by implementation of the Construction Management Plan. Thus, impacts would be less than significant. All of the remaining topics (i.e., water, wastewater, and solid waste) raised in these questions are already covered in Sections IV.M.1, Utilities and Service Systems—Wastewater; IV.M.2, Utilities and Service Systems— Water; and IV.M.3, Utilities and Service Systems—Solid Waste, of the Draft EIR.

3.2.20 Wildfire

New Checklist Question XX. Wildfire pertains to projects that are located in, or near, state responsibility areas or lands classified as very high fire hazard severity zones. The Project Site is not located in or near state responsibility areas, nor is the Project Site located in a City-designated Very High Fire Hazard Severity Zone. Therefore, these questions are not applicable to the Project Site.

4 ENVIRONMENTAL IMPACT ANALYSIS

This section provides an impact assessment of the Revised Project. The information below addresses each of the environmental issues that were previously analyzed within the scope of the previously adopted EIR for the Approved Project and the recently revised Appendix G of the CEQA Guidelines. The conclusions of the previously adopted EIR are provided as a reference for each environmental issue area for purpose of describing how the proposed changes would not result in any new significant impacts and would not increase the severity of the significant impacts identified in the EIR.

This Addendum focuses on changes from the Approved Project to the Revised Project that would affect aesthetics, air quality, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning noise, population and housing, public services, transportation, and utilities.

A Modified Environmental Checklist Form (Form) was used to compare the anticipated environmental effects of the Revised Project with those disclosed in the EIR and to review whether any of the conditions set forth in Public Resources Code, Section 21166 or CEQA Guidelines, Section 15162, requiring preparation of a subsequent or supplemental EIR, have been triggered. The Form provides the following information as to each of the impact thresholds analyzed in each of the impact categories:

IMPACT DETERMINATION IN THE CERTIFIED EIR

This section lists the impact determination made in the Certified EIR for each impact category.

DO PROPOSED CHANGES INVOLVE NEW SIGNIFICANT IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Pursuant to Section 15162(a)(1) of the CEQA Guidelines, this section indicates whether the Revised Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or would result in a substantial increase in the severity of a previously identified impact.

ANY NEW CIRCUMSTANCES INVOLVING NEW IMPACTS OR SUBSTANTIALLY MORE SEVERE IMPACTS?

Pursuant to Section 15162(a)(2) of the CEQA Guidelines, this section indicates whether there have been changes to the Project Site or the vicinity (circumstances under which the project is undertaken) which have occurred subsequent to the prior environmental documents, which would result in the Revised Project having new significant environmental impacts that were not considered in the prior environmental documents or that substantially increase the severity of a previously identified impact.

ANY NEW INFORMATION REQUIRING NEW ANALYSIS OR VERIFICATION?

Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this section indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative; then the question would be answered "Yes," requiring the preparation of a Supplemental or Subsequent EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain unchanged and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or there are no additional mitigation measures or alternatives now available or feasible but declined for adoption by the project proponent, then the question would be answered 'No' and no additional environmental documentation (Supplemental or Subsequent EIR) is required. New studies completed as part of this environmental review are attached to this Addendum, or are on file with the Planning Department.

MITIGATION MEASURES ADDRESSING IMPACTS

Pursuant to Section 15162(a)(3) of the CEQA Guidelines, this section indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, the previously adopted mitigation measures have already been implemented or are not applicable to the Revised Project. A "Yes" response will be provided in either instance. If "No" is indicated, a significant impact was not identified and mitigation was not required.

CONCLUSION

For each environmental topic, a discussion of the conclusion relating to the analysis is provided.

4.1 Aesthetics

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
AESTHETICS: Except as provided in Public Resources Code Section 21099, would the project:					
(a) Have a substantial adverse effect on a scenic vista?	No Impact	No	No	No	No
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No	No	No	No
(c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	No Impact	No	No	No	No
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No Impact	No	No	No	No

This section is based on the following items, which are included as **Appendix B** and **Appendix C** to this Addendum:

B Shade Shadow Exhibits, Withee Malcolm Architects, April 2019.

C Arborist Tree Report, Dudek, June 2019.

In 2013, Governor Edmund G. "Jerry" Brown signed Senate Bill (SB) 743. Among other things, SB 743 adds Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations," and "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes

with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File No. 2452 provides further instruction concerning the definition of transit priority projects and that "[v]isual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the [L.A. CEQA Thresholds Guide] shall not be considered an impact for infill projects within TPAs pursuant to CEQA."

The Project Site is an infill site within the Hollywood community that is zoned for commercial uses. The Project would construct a mixed-use residential and commercial development. Upon completion, the Project would result in approximately 431,963 square feet of new floor area and a maximum floor area ratio (FAR) of 4.46:1. The Project Site has convenient access to public transportation and is served by the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line subway, as well as numerous bus lines. The closest Metro Red Line rail station is the Hollywood/Western Station, located 775 feet northeast of the Project Site. Therefore, the Project is located in a transit priority area, as confirmed by the City of Los Angeles Zoning Information and Map Access System (ZIMAS).[6] As such, the Project qualifies as an employment center project located in a transit priority area, and its aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. The following analysis regarding scenic vistas, scenic resources, consistency with applicable regulations governing scenic quality, and light and glare is provided for informational purposes only, and not for determining whether the Project will result in significant impacts to the environment.[7]

4.1.1 Impact Determination in the EIR

Due to distance and intervening urban development and topography, unusual natural features and the ocean are not visible from the Project area. Glimpses of the Santa Monica and San Gabriel Mountains are available from intermittent viewpoints within the Project area, but anything more than slight views of these resources is not available. No unique urban or historic features are located on or near the Project Site. Additionally, the Project site is not visible from any designated scenic highway. For these reasons, the Project would not have a substantial adverse effect on a scenic vista and would not substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway. In accordance with Zoning Information File No. 2452, the Project would not result in any impacts related to scenic vistas/resources.

6 City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for 1535 Western, www.zimas.lacity.org, accessed June 30, 2019.

7 While not a specific environmental topic under Appendix G this analysis includes an evaluation of shading for informational purposes only in the light and glare section as it is related to light and the City has previously identified criteria for its analysis.

The Project Site is not located near a designated scenic highway.[8] No historic buildings or rock outcroppings are located on the Project Site. The Project Site contains various ornamental landscape, non-protected trees that would be replaced as part of the Project in accordance with the City's tree replacement requirements. As such, the Project would not substantially damage scenic resources, and in accordance with Zoning Information File No. 2452, impacts related to this issue would be less than significant.

The visual character of the Project Site and area is that of a typical urbanized area of the City. Overall development of the area comprises various land uses (commercial, retail, and residential), building heights, build dates, and architecture, including new construction in a contemporary design as well as buildings that are decades older and represent the architectural styles of former times. Other prominent features in the Project area include signage, building and street lighting, and roadway and utility infrastructure.

The Project includes demolition and removal of the existing commercial/retail building, covered storage areas, and surface parking area from the Project Site and development of a mixed-use residential and commercial building. The Project Site is located within the boundaries of the Vermont/Western SNAP, within Subarea C, Community Center. Development of the Project Site is subject to the requirements of the SNAP Development Standards and Design Guidelines that contain provisions to direct change on private and public lands within the boundaries of the SNAP. The City would require that the Project comply with all applicable development and design requirements. Thus, the Project would be consistent with the SNAP Development Standards and Design Guidelines.

Although the Project would alter the visual character of the Project site by removing the existing commercial/retail land uses from the Project site and development the site with a mixed residential/retail building, this alteration would not constitute a substantial degradation to the visual character of the Project site or surrounding area. In accordance with Zoning Information File No. 2452, the Project would not result in any impacts related to visual character.

All of existing land uses in the area produce light and glare (e.g., indoor/outdoor lighting, windows, light-colored surfaces, etc.) typical of such uses in an urban area. The Project would include interior and exterior lighting that complies with the LAMC provision that requires minimizing the effect of the new sources of lighting.[9] The Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. In accordance with Zoning Information File No. 2452, the Project would not result in any impacts related to light and glare.

According to the L.A. CEQA Thresholds Guide, facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors. Based on a review of the land uses surrounding the Project site, the closest potential shade-sensitive land uses in proximity to the Project site are multi-family and

8 Los Angeles Department of City Planning, Mobility Plan 2035, Citywide General Plan Circulation System Map A4, Central, Midcity Subarea, January 20, 2016.

9 LAMC Section 91.6205 requires that new lighting sources not exceed 1.0 foot-candle of new light spillover at residential property lines. LAMC Section 93.0117 requires non-reflective glass.

single-family residential land uses to the northwest and north of the Project Site. A review of the residential uses shows that the areas between the residential buildings are used for vehicle parking or is paved. Therefore, there is no shadow-sensitive receptor adjacent to the Project Site. As shown on Figures IV.M-3 and IV.M-5 of the Draft EIR, no shade-sensitive receptors would be shaded for a significant number of hours. In accordance with Zoning Information File No. 2452, the Project would not result in any impacts related to shade/shadow.

4.1.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would have similar massing as the Project, although it would be taller in building height. The additional 15 feet of height would not affect views of scenic vistas, which would remain visible from public sidewalks. This would similarly not be considered a significant impact on the environment pursuant to Public Resources Code Section 21099. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

The Revised Project is in the same location as the Approved Project and similarly is not located near a designated scenic highway or contain scenic resources. The Draft EIR analysis adequately addresses the Revised Project. No new analysis is needed. This would similarly not be considered a significant impact on the environment pursuant to Public Resources Code Section 21099. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

Regarding visual character and conflicts with applicable zoning and other regulations governing scenic quality, the City would require that the Revised Project comply with all applicable development and design requirements or receive entitlements to deviate from those requirements. Thus, the Revised Project would be consistent with the SNAP Development Standards and Design Guidelines. Like the Approved Project, the Revised Project is seeking several discretionary requests and affordable housing incentives to deviate from the SNAP, including an increase in buildable floor area to allow for a floor area ratio of 4.5:1 in the designated Highway Oriented Commerce area in lieu of 3:1; to eliminate the East/West pedestrian throughway; an increase in building height from 75' to a proposed 95'; and to permit 169 shared guest and commercial parking spaces, in lieu of the otherwise permitted maximum of 206 guest parking spaces, of which a maximum of 71 parking spaces are shared for commercial parking. This would similarly not be considered a significant impact on the environment pursuant to Public Resources Code Section 21099. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

The Revised Project would have similar window placement and exterior building materials as the Approved Project and thus the same light and glare generation as the Approved Project. The Revised Project would have an additional 15 feet of height. This would extend the shadow projection. A review of the residential uses shows that the areas between the residential buildings are used for vehicle parking or is paved. Similar to the conditions analyzed under the Approved Project, there is no shadow-sensitive receptor adjacent to the Project Site.

As shown in Appendix B to this Addendum, the Revised Project would cast shadows to the west and east during the Summer Solstice. During the transit of the sun, from 9:00 AM to 5:00 PM, shadows from the Project would fall on the adjacent multi-family residences, Western Avenue, and commercial structures west of the Site. However, no shade-sensitive receptors would be shaded for more than 4 hours between the hours of 9:00 AM and 5:00 PM.

As shown in Appendix B to this Addendum, the Revised Project would cast shadows to the northwest and north during the Winter Solstice. During the transit of the sun, from 9:00 AM to 3:00 PM, shadows from the Project would fall on the adjacent multi-family residences, Western Avenue, and commercial structures west of the Site. However, no shade-sensitive receptors would be shaded for more than 3 hours between the hours of 9:00 AM and 3:00 PM.

This would not be considered a significant impact on the environment pursuant to Public Resources Code Section 21099. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.1.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to visual or aesthetic resources. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.1.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to visual or aesthetic resources. No substantial changes in the aesthetic or visual environment have occurred since certification of the EIR, and no substantial new scenic resources have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts. Finally, as it has been determined the Revised Project will not result in any aesthetic impacts, a review of feasible mitigation measures is not required.

4.1.5 EIR's Mitigation Measures Addressing Impact

Since the EIR determined the Project would have no impacts on aesthetics, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.1.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.2 Agricultural and Forestry Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
AGRICULTURE AND FORESTRY RESOURCES: Would the project:					
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	No	No	No	No
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	No	No
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact	No	No	No	No
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact	No	No	No	No
(e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact	No	No	No	No

4.2.1 Impact Determination in the EIR

The Initial Study prepared for the Approved Project did not identify any impacts to agricultural or forestry resources. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category. The Project Site is not zoned for agricultural use, and the site is not under Williamson Act Contract. The Project Site is not zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

4.2.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would be on the same site as the Approved Project. No new analysis is needed. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.2.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to agricultural and forestry resources. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.2.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to agricultural or forestry resources. No substantial changes have occurred since certification of the EIR, and no new agricultural or forestry resources have been identified within the vicinity of the Revised Project that would result in new or more severe significant environmental impacts. Finally, as it has been determined the Revised Project will not result in any agricultural or forestry resources impacts, a review of feasible mitigation measures is not required.

4.2.5 EIR's Mitigation Measures Addressing Impact

Since the EIR determined the Project would have no impacts on agricultural or forestry, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.2.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.3 Air Quality

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
AIR QUALITY: Would the project:					
(f) Conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant Impact	No	No	No	No
(g) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Less Than Significant With Mitigation	No	No	No	Yes
(h) Expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant With Mitigation	No	No	No	Yes
(i) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	No Impact	No	No	No	No

This section is based on the following item, which is included as **Appendix D** to this Addendum:

D Air Quality and Greenhouse Gas Emissions Appendix, Noah Tanski Environmental Consulting, September 2019.

4.3.1 Impact Determination in the EIR

The Approved Project would neither conflict with the SCAQMD's 2012 AQMP nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by SCAG. Specifically, SCAG's growth forecasts from the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The Project site is located in the City's Hollywood Community Plan area. The Community Plan implements land use standards of the General Plan Framework at the local level. The General Plan Land Use Element designates the Project Site as Highway Oriented Commercial, a designation that allows a mix of residential and commercial land uses, such as those in the Approved Project. As such, the SCAG RTP does recognize the potential development of residential and commercial land uses on the Project site. The Approved Project would include new residents and workers in line with the population-based growth assumptions of the RTP/SCS and AQMP. As such, the Approved Project would not conflict with the

population-based growth assumptions in the AQMP, and impacts related to this issue would be less than significant.

Regarding criteria pollutants, as shown on Table IV.B-6 of the Draft EIR, construction of the Project would not produce VOC, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that would exceed the SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants. Therefore, Project impacts related to regional construction emissions would be less than significant.

In terms of local air quality, the Approved Project would not produce emissions that would exceed the SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. However, construction activities could produce PM_{10} and $PM_{2.5}$ emissions that would exceed localized thresholds recommended by the SCAQMD, primarily from vehicle exhaust and fugitive dust emissions from off-road construction vehicles during the site grading and excavation phase. Therefore, Project impacts related to localized construction emissions would be potentially significant without mitigation. As shown on Table IV.B-8 of the Draft EIR, implementation of Mitigation Measures B-1 through B-5 would substantially reduce on-site PM_{10} and $PM_{2.5}$ emissions during the site preparation, grading, and other phases of construction that involve use of off-road diesel-fueled construction equipment. As a result, construction of the Approved Project would not produce any local violation of air quality standards or contribute substantially to an existing or projected air quality violation, and Project impacts would be reduced to a less than significant level. Based on the estimated mass emissions following implementation of Mitigation Measures B-1 thought B-5, any overlap of construction phases would not exceed regional or localized SCAQMD thresholds of significance for any criteria pollutant.

Regarding operational impacts, the Project would produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could result in an increase of up to 2,562 net vehicle trips to and from the Project Site on a future operating year peak weekday, when compared to existing conditions.[10] However, as shown on Table IV.B-7 of the Draft EIR, the Approved Project's operational emissions would not exceed the SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10} and $PM_{2.5}$ emissions. As a result, the Approved Project's operational impacts on regional air quality would be less than significant. With regard to localized air quality impacts, as shown on Table IV.B-7 of the Draft EIR, the Project would emit minimal emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from area and energy sources on-site. These localized emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. Therefore, the Approved Project impacts related to localized operational emissions would be less than significant.

The Approved Project would not result in other localized impacts such as CO hotspots and substantial TAC emissions. The EIR determined that the Approved Project would not contribute to the levels of congestion that would be needed to produce the emissions and conditions

[10] Overland Traffic Consultants, Traffic Impact Analysis; December 2015.

needed to trigger a potential CO hotspot. It also determined that the Approved Project's construction would not produce chronic, long-term exposure to diesel particulate matter or other TACs, and the Approved Project's operations would not include typical TAC sources such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities.

As illustrated on Table IV.B-6 of the Draft EIR, nearby receptors could be exposed to substantial concentrations of localized pollutants PM_{10} and $PM_{2.5}$ from construction of the Approved Project. Specifically, as noted previously, construction activities would produce emissions that could exceed SCAQMD LST thresholds for PM_{10} and $PM_{2.5}$ and represent a significant impact. Therefore, Project impacts related to exposure of sensitive receptors to substantial concentrations of localized pollutants during construction would be significant without mitigation. However, implementation of Mitigation Measures B-1 through B-5 would reduce the Approved Project's local construction emissions to below SCAQMD's significance thresholds, and the Approved Project's impacts related to sensitive receptors would be less than significant.

No objectionable odors are anticipated as a result of either construction or operation of the Approved Project. Specifically, construction of the Approved Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. The Approved Project would involve the construction and operation of a mixed-use residential and commercial, which includes land uses that are not typically associated with odor complaints according to the SCAQMD. In addition, the proposed restaurant uses would comply with SCAQMD Rule 1138 regarding restaurant emissions. On-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. In addition, the Project would not include an open-air loading dock, which could have the potential to emit objectionable odors. Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.[11] Therefore, the Approved Project would not create objectionable odors affecting a substantial number of people.

4.3.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The 2016 AQMP was adopted in April 2017 (after the release of the Draft EIR) and represents the most updated regional blueprint for achieving federal air quality standards. The 2016 AQMP updates previously conducted regional air quality analyses to account for the recent unexpected drought conditions, and presents a revised approach to demonstrate attainment of the 2006 24-hour PM2.5 NAAQS for the Basin. Additionally, the 2016 AQMP relies upon a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the

[11] SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed June 27, 2019.

impact of existing control measures to evaluate strategies for reducing NOX emissions sufficiently to meet the upcoming ozone deadline standards.

The 2016 AQMP is more stringent than the 2012 AQMP, as it incorporates $PM_{2.5}$ control strategies from the 2012 AQMP, but strengthens control measures and increases emission reductions associated with attainment of other criteria pollutants. As such, a Project that is consistent with the 2016 AQMP would also be consistent with the 2012 AQMP.

The 2016 AQMP relies on the regional population growth forecasts of the 2016–2040 RTP/SCS. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. According to the California Department of Finance, the population for the City of Los Angeles in 2019 was approximately 4,040,079 persons. In 2040, the City of Los Angeles is anticipated to have a population of approximately 4,609,400 persons.

The Revised Project would include 412 residential units that could accommodate a population of about 997 residents, based on the Citywide housing density average of 2.42 persons per housing unit. This would represent 0.18 percent of population growth projected in the City of Los Angeles from 2019 to 2040 in the AQMP. Since the Revised Project's resulting population growth would fall well within the growth forecasts for the City and similar projections form the basis of the 2016 AQMP, and the reduction in employment is minor and would have a negligible, non-significant impact on employment projections, it can be concluded that the Revised Project would be consistent with the projections in the AQMP. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

In fact, the Revised Project's additional 119 dwelling units (73 market rate units and 46 Very Low Income Restricted Affordable Housing units) and additional 1,714 square feet of commercial area would further advance the smart growth goals of the 2016-2040 RTP/SCS by focusing additional density and growth within a High Quality Transit Area (HQTA) as designated by the 2016-2040 RTP/SCS. The 2016-2040 RTP/SCS assumes a significant increase in multi-family housing built in infill locations near bus corridors and other transit infrastructure, in some cases projecting increases that outpace what is currently anticipated by local general plans. The Revised Project would not conflict with or obstruct the implementation of the latest air quality plan and would not result in new or increased significant impacts.

Table 4-1 includes the estimated construction emissions associated with the Approved Project (both prior to and after mitigation) and the Revised Project, by phase. As shown, neither the Approved (with mitigation) or Revised Projects' construction emissions would exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$.

However, whereas the Approved Project was projected to generate construction-related emissions in excess of SCAQMD localized significance thresholds for PM_{10} and $PM_{2.5}$ before mitigation, the Revised Project's unmitigated construction emissions are not projected to exceed any localized significance thresholds. This is primarily due to the following reasons:

- First, the EIR conservatively anticipated that the Approved Project's construction could result in some overlapping of the grading and building construction phases. However, refinements to the Revised Project's estimated construction schedule have ruled out the possibility of these construction phases overlapping. Grading will occur first and building construction will follow.

- Second, the EIR assumed that daily off-site hauling of the Approved Project's excavated soils would occur over the course of a standard work-day and could thus be completed in approximately three months. However, it is now known that the Revised Project's off-site hauling would occur only during off-peak traffic hours, a five-hour daily window. As less hauling would occur on a per-day basis due to this restriction, some daily mass emissions associated with grading activities would subsequently be reduced despite the Revised Project's overall increase in total export, and the Revised Project's entire grading phase would be extended by approximately five months.

- Third, it is important to consider that the CalEEMod air quality modeling program has been revised twice since the formation of the Approved Project's EIR, and, generally speaking, CalEEMod's default emissions factors for construction equipment decrease over time to account for the increased penetration of newer, less-polluting equipment in the statewide construction vehicle fleet. Construction of the Revised Project is estimated to commence in July 2021, four years later than the estimated commencement of the Approved Project.

- Finally, these factors combined to result in construction emissions that are not projected to exceed any localized significance thresholds, despite the fact that the equipment assumptions used to model the Revised Project's construction emissions generally exceed the assumptions used for the Approved Project. For example, the Revised Project assumes a total of nine grading equipment whereas the Approved Project assumes only seven. Additionally, the Revised Project assumes that all demolition, site preparation, grading, building construction, and paving equipment would operate for eight hours per workday, but the Approved Project assumes that some equipment would operate on reduced work schedules.

Table 4-1
Estimated Daily Construction Emissions – Approved, Approved with Mitigation, and Revised Project Comparison

Construction Phase	Pounds Per Day																	
	VOC			NO_X			CO			SO_X			PM_{10}			$PM_{2.5}$		
	App	App-M	Rev	App	App-M	Rev	App	App-M	Rev	App	App-M	Rev	App	App-M	Rev	App	App-M	Rev
Demolition																		
On-Site Emissions	3	<1	2	27	1	22	21	15	18	<1	<1	<1	5	1	2	2	<1	1
Off-Site Emissions	<1	<1	<1	5	5	6	4	4	2	<1	<1	<1	1	<1	<1	<1	<1	<1
Total Emissions	3	<1	3	32	6	28	25	19	20	<1	<1	<1	5	1	3	2	<1	1
Site Preparation																		
On-Site Emissions	3	<1	2	29	1	19	17	13	11	<1	<1	<1	1	<1	1	1	<1	1

Off-Site Emissions	<1	<1	<1	<1	<1	<1	1	1	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1
Total Emissions	3	<1	2	29	1	19	18	14	11	<1	<1	<1	1	<1	2	1	<1	1
Grading																		
On-Site Emissions	3	<1	3	38	2	33	30	27	23	<1	<1	<1	>8	2	4	>5	1	3
Off-Site Emissions	4	4	1	59	59	28	42	42	8	<1	<1	<1	5	4	3	2	2	1
Total Emissions	7	4	4	97	61	62	72	69	31	<1	<1	<1	>13	6	7	>7	3	3
Building Construction																		
On-Site Emissions	6	1	4	51	4	31	32	38	33	<1	<1	<1	3	<1	2	3	<1	2
Off-Site Emissions	1	1	2	3	3	6	17	17	13	<1	<1	<1	3	2	2	1	1	1
Total Emissions	7	2	6	54	7	36	49	55	45	<1	<1	<1	5	2	5	3	1	3
Paving																		
On-Site Emissions	2	<1	1	14	1	11	13	14	14	<1	<1	<1	1	<1	1	1	<1	1
Off-Site Emissions	<1	<1	<1	<1	<1	<1	1	1	1	<1	<1	<1	<1	<1	<1	<1	<1	<1
Total Emissions	2	<1	1	14	1	11	14	14	15	<1	<1	<1	1	<1	1	1	<1	1
Architectural Coatings																		
On-Site Emissions	33	33	19	2	<1	1	2	2	2	<1	<1	<1	<1	<1	<1	<1	<1	<1
Off-Site Emissions	<1	<1	<1	<1	<1	<1	2	2	1	<1	<1	<1	<1	<1	<1	<1	<1	<1
Total Emissions	33	33	19	2	<1	1	4	3	3	<1	<1	<1	<1	<1	<1	<1	<1	<1
Maximum Regional Total	33	33	25	97	61	62	72	69	62	<1	<1	<1	13	6	7	7	3	3
Regional Significance Threshold	75			100			550			150			150			55		
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Total	33	33	19	51	4	33	32	38	33	<1	<1	<1	>8	2	4	>5	1	3
Localized Significance Threshold	-			108			1,048			-			8			5		
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**Yes**	**No**	**No**	**Yes**	**No**	**No**

"App" = Approved Project
"App-M" = Approved Project with Mitigation
"Rev" = Revised Project
Source: DKA Planning 2016 and NTEC 2019. LST analysis based on 2-acre site with 25-meter distances to receptors in SRA No.1, "Central Los Angeles."

As the Revised Project's unmitigated construction emissions are not projected to exceed any localized significance thresholds, the EIR's Mitigation Measures B-1 through B-5 would no longer be required to reduce construction emissions to below threshold levels. Nonetheless, the Revised Project will incorporate the Mitigation Measures to further reduce its less than

significant impacts. The Revised Project would continue to comply with SCAQMD Rule 403 to reduce fugitive dust emissions and ensure its compliance with SCAQMD Rule 403.

The SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds also be considered cumulatively considerable.[12] Thus, individual projects that do not generate emissions in excess of SCAQMD regional and localized significance thresholds would not contribute considerably to any potential cumulative impact.

As discussed previously and shown in **Table 4-1**, the Revised Project's daily construction emissions would not exceed any SCAQMD regional or localized thresholds. Thus, the Revised Project's contribution to regional or localized emissions impacts would not be cumulatively considerable. Not only would the Revised Project not result in any new or increased significant impacts, but unlike the Approved Project, it would also not result in any significant impacts before mitigation as a result of its construction-related emissions.

Table 4-2 includes the estimated daily operational emissions associated with the Approved Project and the Revised Project. As shown, the Revised Project would not introduce any new major sources of air pollution: daily operational emissions would not exceed SCAQMD regional or localized significance thresholds.

As discussed previously and shown in **Table 4-2**, like the Approved Project, the Revised Project's daily operational emissions would not exceed any SCAQMD regional or localized thresholds. Thus, the Revised Project's contribution to regional or localized emissions impacts would not be cumulatively considerable. The Revised Project not result in any new or increased significant impacts, and similar to the Approved Project, it would also not result in any significant impacts before mitigation as a result of its operation-related emissions.

Table 4-2
Estimated Daily Operations Emissions – Approved and Revised Project Comparison

Emission Source	Pounds Per Day											
	VOC		NO_X		CO		SO_X		PM_{10}		$PM_{2.5}$	
	App	Rev	App	Rev	App	Rev	App	Rev	App	Rev	App	Rev
Area Sources	12	10	<1	<1	24	34	<1	<1	1	<1	1	<1
Energy Sources	<1	<1	<1	1	1	1	<1	<1	<1	<1	<1	<1
Mobile Sources	10	6	24	26	98	76	<1	<1	19	26	6	7
Total Operations	22	17	25	27	123	111	<1	<1	19	26	6	7
Existing Operations	-4		-10		-41		-<1		-6		-2	
Net Regional Total	18	13	15	17	82	70	<1	<1	13	20	4	5
Regional Significance Threshold	55		55		550		150		150		55	
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**
Net Localized Total	12	10	<1	<1	24	34	<1	<1	1	<1	1	<1

[12] White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix E, p. D-3.

Localized Significance Threshold	-		108		1,048		-		2		2	
Exceed Threshold?	**N/A**	**N/A**	**No**	**No**	**No**	**No**	**N/A**	**N/A**	**No**	**No**	**No**	**No**

"App" = Approved Project
"Rev" = Revised Project
The Revised Project's noted decrease in area source emissions is mostly due to the EIR's conservative assumption that each residential unit could have included a gas fireplace. However, it has since been confirmed that residences would not include any fireplaces, and the latest modeling accounts for this. The Revised Project's increase in energy source emissions is partly due to its additional 119 residential units and modified commercial land usage, but another major factor is that the EIR did not separately model the emissions associated with the Approved Project's parking garage. Modeling of the Revised Project's emissions accounted for the proposed parking garage. The Revised Project's additional 119 residential units and modified commercial land usage would result in increased Project-related vehicle trips that would contribute to additional Project-associated mobile source emissions.
Source: DKA Planning 2016 and NTEC 2019. LST analysis based on 2-acre site with 25-meter distances to receptors in SRA No.1, "Central Los Angeles."

As shown in **Tables 4-1** and **4-2**, the Revised Project would not generate localized emissions in excess of SCAQMD construction and operational significance thresholds. The Revised Project would also not result in CO hotspots or substantial TAC emissions. Traffic levels of service at the 15 intersections studied in the vicinity of the Project would not be significantly impacted by the Revised Project's traffic volumes. As a result, the Revised Project would not contribute to the levels of traffic congestion necessary to trigger a potential CO hotspot. Regarding TAC emissions, the Project does not propose typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. The Revised Project would not expose sensitive receptors to substantial pollutant concentrations, and its impact would be less than significant.

The Revised Project would develop the same uses as the Approved Project. None of the proposed uses is identified by the SCAQMD as an industrial operation that could generate odors. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people. With regard to operations, the Revised Project proposes typical commercial and residential land uses that are not frequently associated with odor complaints. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.3.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to air quality. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.3.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to air quality. No substantial changes in the environment have occurred since certification of the EIR, and no substantial new air quality impacts have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts. Finally, as it has been determined the Revised Project will not result in any new or substantially more severe air quality impacts, a review of feasible mitigation measures is not required.

4.3.5 EIR's Mitigation Measures Addressing Impacts

The mitigation measures adopted by the EIR are listed below:

B-1: All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions at the Project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

B-2: Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and, if the City determines that 2010 model year or newer diesel trucks cannot be obtained, the City shall require trucks that meet U.S. EPA 2007 model year NO_X emissions requirements.

B-3: At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided to the City.

B-4: Construction activities shall comply with SCAQMD Rule 403, including the following measures:

- Apply water to disturbed areas of the site three times a day.
- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to dust/particulate matter generation.
- Limit soil disturbance to the amounts analyzed in the Final EIR.[13]
- All materials transported off-site shall be securely covered.

[13] The Revised Project's total amount of exported soils would increase from 78,270 cubic yards (CY) as noted in the Draft EIR to 175,000 CY as noted in this Addendum.

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).

- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

B-5: Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.

As the Revised Project's unmitigated construction emissions are not projected to exceed any localized significance thresholds, the EIR's Mitigation Measures B-1 through B-5 would no longer be required to reduce construction emissions to below threshold levels. Nonetheless, the Revised Project will incorporate the Mitigation Measures to further reduce its less than significant impacts. The Revised Project would continue to comply with SCAQMD Rule 403 to reduce fugitive dust emissions and ensure its compliance with SCAQMD Rule 403.

As a note, the Final EIR MMP and Letter of Determination inadvertently left out MM B-5, which was identified as a mitigation measure in the Draft EIR. MM B-5 restates SCAQMD Rule 1113, which would apply to the Project in any case as it is regulatory. Further, for conservative purposes, the modeling does not assume the application of Rule 1113 when modeling the architectural coatings for the Revised Project. Instead, the CalEEMod default VOC assumptions were used for a conservative analysis. Nonetheless, MM B-5 will be included for the Revised Project.

4.3.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.4 Biological Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
BIOLOGICAL RESOURCES: Would the project:					
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact	No	No	No	No
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact	No	No	No	No
(c) Have a substantial adverse effect on state or federally-protected wetlands, (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	No	No	No	No
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No Impact	No	No	No	No
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less Than Significant	No	No	No	No
(f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	No	No	No	No

4.4.1 Impact Determination in the EIR

The Initial Study prepared for the Approved Project did not identify any impacts to biological resources. The Project Site is completely developed with commercial and parking land uses and

contains some vegetation, and but the site does not support any sensitive species. The Project Site is completely developed with commercial and parking land uses and does not contain any riparian habitat or sensitive natural community. The site is completely developed with commercial and parking land uses and does not contain any wetlands or other areas subject to the jurisdiction of the US Army Corps of Engineers, California Department of Fish and Wildlife, or State Water Resources Control Board under the Clean Water Act. Given the developed nature of the Project area, the area is not used as a significant wildlife corridor. Additionally, there are no waterways in the Project area that are used by migratory fish, and there are no wildlife nursery sites in the area. The Project site contains various ornamental landscape, non-protected trees that would be replaced as part of the Project in accordance with the City's tree replacement requirements. The Project site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan.

4.4.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would be on the same site as the Approved Project. No new analysis is needed. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.4.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to biological resources. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.4.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to biological resources. No substantial changes in the environment related to biological resources have occurred since certification of the EIR, and no substantial new biological resources have been identified within the vicinity of the Revised Project that would result in new or more severe significant environmental impacts. Finally, as it has been determined the Revised Project will not result in any biological resource impacts, a review of feasible mitigation measures is not required.

4.4.5 Mitigation Measures Addressing Impact

Since the Initial Study determined the Project would have no impacts on biological resources, no mitigation measures were required. The Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.4.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.5 Cultural Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
CULTURAL RESOURCES: Would the project:					
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?	No Impact	No	No	No	No
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	Less Than Significant	No	No	No	No
(c) Disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant	No	No	No	No

4.5.1 Impact Determination in the EIR

The Initial Study prepared for the Approved Project did not identify any impacts to cultural resources. No historical resources are located at the Project site, and no impacts related to this issue would occur. Considering that the Project site has already been developed, any archeological resources at the site could have already been encountered. In the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment, in conformance with California Public Resources Code Section 21083.2. Any Native American remains or human remains shall also be treated in accordance with state law. Through compliance with the State's requirements, potential Project impacts to unknown archaeological resources or human remains would be less than significant.

4.5.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would be on the same site as the Approved Project. No new analysis is needed. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.5.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to cultural resources. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.5.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to cultural resources. No substantial changes in the environment related to cultural resources have occurred since certification of the EIR, and no substantial new cultural resources have been identified within the vicinity of the Revised Project that would result in new or more severe significant environmental impacts. However, as City policy, the City has implemented new standard conditions of approval to provide guidance and address inadvertent discoveries of archeological resources or human remains. As part of the project's entitlements, those standard conditions of approval would be incorporated. Finally, as it has been determined the Revised Project will not result in any cultural resource impacts, a review of feasible mitigation measures is not required.

4.5.5 Mitigation Measures Addressing Impact

Since the Initial Study determined the Project would have no impacts on cultural resources, no mitigation measures were required. The Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.5.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.6 Energy

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
ENERGY: Would the project:					
(a) Result in potentially significant environmental impact due to wasteful inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant	No	No	No	No
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less Than Significant	No	No	No	No

4.6.1 Impact Determination in the EIR

During plan check, the City will assure that the Project plans comply with existing LAMC requirements for energy-efficiency including compliance with Green Building Code requirements to ensure the project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources. The Project would be consistent with the LAMC which incorporates California Green Building Standards Code (CALGreen Code or CGBSC) Title 24 standards. The CALGreen Code establishes minimum standards for energy efficient construction practices. The CalGreen Code is periodically updated to require increased energy efficiency. The Project would be built to the latest codes in effect at the time of construction.

Electricity, when needed, would be supplied by LADWP via existing on-site connections. The Project's construction phase would occur over approximately 24 months. During the Approved Project's construction phase, short-term construction activities would consume relatively small quantities of electricity (i.e., temporary use for lighting and small power tools). General construction and renovation activity would generally not result in a net increase in on-site electricity use over existing conditions, since the Project site was occupied at the time of the EIR analysis. The Approved Project would represent 0.0004 percent of the statewide gasoline consumption and 0.00001 percent of the statewide diesel consumption. The expected construction gasoline and diesel fuel for the Project would be negligible compared with statewide supplies and would be readily accommodated by local or regional suppliers and vendors.

For operation, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption. The Approved Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. Energy conservation features would be incorporated into the Project in accordance with Title 24 of the CCR (CalGreen) and the LA Green Building Code. Electrical service would

be provided in accordance with the LADWP's Rules Governing Water and Electric Service. Project impacts related to electricity consumption would be less than significant. There is adequate local and regional natural gas supply to accommodate the Project's demand for natural gas, and the Approved Project would use natural gas amounts standard for a mixed-use development and within growth forecasts for the area. Therefore, Approved Project's impacts related to natural gas would be less than significant. SCG would also make adequate changes in order to provide the load to the customer, as SCG has an obligation to serve projects in its service area. Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on the Approved Project's estimated VMT of approximately 8.269 million miles per year[14], and assuming the Approved Project's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 22.711 mpg, approximately 365,021 gallons of fuel would be required in a year. According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources consumed 4.07 billion gallons of gasoline in 2019.[15] This would represent approximately 0.01 percent of the gasoline consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project site would reduce the Approved Project's consumption of gasoline and diesel. With compliance with regulatory measures, the Approved Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

The Project would be consistent with the policies emphasized by the 2016-2040 RTP/SCS. The Project would be a mixed-use Project and located in a transit-rich area that would result in a reduction of vehicle trips and miles. The LADWP electricity portfolio in 2017 is made up of coal (18 percent), natural gas (31 percent), renewables[16] (30 percent), nuclear (10 percent), unspecified sources (7 percent), and large hydroelectric (4 percent).[17] The Project would be designed to comply with all applicable state and local codes, including the City's Green Building Ordinance and the California Green Building Standards Code. Design features that could be implemented would include, but not be limited to, use of efficient lighting technology; energy efficient heating, ventilation and cooling equipment; and Energy Star rated products and appliances. In addition, the Project would incorporate a variety of water conservation features required by the LAMC that would also promote energy conservation. Therefore the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

4.6.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

14 Draft EIR, CalEEMod modeling, Appendix B1.

15 California Air Resources Board, EMFAC2017 Web Database, www.arb.ca.gov/emfac/2017/, accessed September 30, 2019.

16 Renewable energy sources include biomass & waste (1%), geothermal (4%), small hydroelectric (4%), solar (11%), and wind (10%).

17 https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures;jsessionid=p5VSdTcQnDgy0rGq2JGRDZVphY4Mm2T7p2P1xfvS8qDjzynn2n89!-1074739049?_afrLoop=408587084332655&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D408587084332655%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dj2v8palzl_4

The Revised Project would continue to be served by LADWP and SCG supplies, which have an obligation to serve the Site. Peak electrical demand is expected to grow from 5,881 mw in 2018-2019 to 5,976 mw in 2023-2024.[18] Despite these growth projections, they would still not exceed the existing capacity of 7,300 mw. As shown on **Table 4-3**, the Revised Project would result in a net demand of approximately 2,442,629 kw-h of electricity per year. This is an increase of 675,843 kw-h (38%) as compared to the Approved Project (which uses 1,766,786 kw-h). The Revised Project's annual electricity consumption would represent approximately 0.01 percent of the LADWP's forecasted electricity demand in 2024.[19] Thus, the Revised Project continues to be within the anticipated demand of the LADWP system. Although electricity usage would result in a 38% increase over the Approved Project, it would still be within the anticipated forecasted demand and would still result in less than significant impacts.

The Revised Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The Revised Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[20] It should also be noted that the Revised Project's estimated electricity consumption is based on usage rates that do not account for the Project's energy conservation features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the Revised Project would likely be lower than that forecasted. Based on the above analysis, the Revised Project would not result in wasteful inefficient, or unnecessary consumption of energy resources and no construction or operational impacts associated with the consumption of electricity would occur.

Table 4-3
Estimated Project Electricity Demand

Land Use	Size	Electricity Consumption Rates[1]	Total (kw-h/yr)
Existing (to be removed)			
Commercial/Retail	26,457 sf	13.55 kw-h/year/sf	(358,492)
Proposed			
Residential	412 du	5,626.50 kw-h/ year /unit	2,318,118
Leasing Office	1,190 sf	12.95 kw-h/ year /sf	15,411
Retail	34,504 sf	13.55 kw-h/ year /sf	467,592
		Proposed Subtotal	**2,801,121**
		Net Total	**2,442,629**

kw-h/yr = kilowatt hour per year sf = square feet du = dwelling unit
[1] SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate

18 LADWP, 2017 SLTRP, Appendix A, https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc;jsessionid=GRTQcCDJNj21nbZ7VjpxhmQ7R1Jnqh7f24NNn20q34dDSz8v1W2M!1805156640?_adf.ctrl-state=12do6zwhm2_33&_afrLoop=692892870477547&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D692892870477547%26_afrWindowMode%3D0%26_adf.ctrl-state%3D155nsya0z1_4

19 2.8 / 23,033 x 100% = 0.01%

20 LADWP Rules Governing Water and Electric Service: http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf

As shown on **Table 4-4**, the Revised Project would result in an estimated net increase of approximately 1,702,266 cubic feet of natural gas per month. This is an increase of 469,266 (38%) cubic feet as compared to the Approved Project (which uses 1,233,000 cf/mo).

Table 4-4
Estimated Project Natural Gas Demand

Land Use	Size	Natural Gas Consumption Rates[1]	Total (cf/mo)
Existing (to be removed)			
Commercial/Retail	26,457 sf	2.9 cf/mo/sf	(52,914)
Proposed			
Residential	412 du	4,011.5 cf/mo/unit	1,652,738
Leasing Office	1,190 sf	2.0 cf/mo/sf	2,380
Retail	34,504 sf	2.9 cf/mo/sf	100,062
		Project Subtotal	**1,755,180**
		Net Total	**1,702,266**

cf = cubic feet sf = square feet du = dwelling unit
[1] SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate

The SCG capacity in 2019 is estimated at 3,385 million cf/day and by 2024 is estimated at 3,775 million cf/day[21] Therefore, it is anticipated that adequate supplies exist to accommodate the Project's demand for natural gas. Even if this were not the case, SCG would make the adequate changes in order to provide the load to the customer, as SCG has an obligation to serve projects in its service area. Overall, the Project would not require the acquisition of additional natural gas resources beyond those that are anticipated by SCG. Although the Revised Project is anticipated to result in a 38% increase over the Approved Project, it would still be within the anticipated forecasted demand and would still result in less than significant impacts.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Ordinance and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards. Therefore, because of energy efficient design features, compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the site, the Revised Project would not result in wasteful inefficient, or unnecessary consumption of energy resources and construction and operational impacts associated with the consumption of natural gas would be less than significant.

21 https://www.socalgas.com/regulatory/documents/cgr/2018_California_Gas_Report.pdf.

Based on the Revised Project's estimated VMT of approximately 11.9 million miles per year[22], and assuming the Revised Project's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 22.711 mpg, approximately 523,975 gallons of fuel would be required in a year. This is an increase of 158,954 gallons (43%) as compared to the Approved Project (which uses 365,021 gallons).

According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources consumed 4.07 billion gallons of gasoline in 2019.[23] The Revised Project would represent approximately 0.01 percent of the gasoline consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project site would reduce the Revised Project's consumption of gasoline. Although the Revised Project would result in a 43% increase over the Approved Project in terms of gasoline usage, it would still be within the anticipated forecasted demand. The Revised Project would not result in wasteful inefficient, or unnecessary consumption of energy resources and construction and operational impacts associated with the consumption of gasoline would be less than significant.

Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.6.3 Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to energy. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.6.4 Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to energy. No substantial changes in the environment related to energy have occurred since certification of the EIR, and no substantial new cultural resources have been identified within the vicinity of the proposed Revised Project that would result in new or more severe significant environmental impacts. Finally, as it has been determined the Revised Project will not result in any energy impacts, a review of feasible mitigation measures is not required.

4.6.5 Mitigation Measures Addressing Impact

Since the Draft EIR Section IV.L, Utilities and Service Systems – Energy, determined the Project would have no impacts on energy, no mitigation measures were required. The Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

22 CalEEMod modeling, included as appendix to this Addendum.

23 California Air Resources Board, EMFAC2017 Web Database, www.arb.ca.gov/emfac/2017/, accessed September 30, 2019.

4.6.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.7 Geology and Soils

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
GEOLOGY AND SOILS: Would the project:					
(a) Directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury or death involving:					
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	No Impact	No	No	No	No
(ii) Strong seismic ground shaking?	Less Than Significant	No	No	No	No
(iii) Seismic-related ground failure, including liquefaction?	Less Than Significant	No	No	No	No
(iv) Landslides?	No Impact	No	No	No	No
(b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant	No	No	No	No
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less Than Significant	No	No	No	No
(d) Be located on expansive soil, as defined in Table 18- 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less Than Significant	No	No	No	No
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	No	No	No	No
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant	No	No	No	No

This section is based on the following item, which is included as **Appendix E** to this Addendum:

E Geotechnical Engineering Investigation, Geotechnologies, Inc., April 18, 2019.

4.7.1 Impact Determination in the EIR

As shown in the Initial Study, the Approved Project would have no impact relating to earthquake rupture of the Alquist-Priolo Earthquake Fault, landslides, or soils incapable of adequately supporting the use of septic tanks, as these conditions do not apply to the Project Site. The Draft EIR, Section IV.C Geology and Soil, and the Geotechnical Engineering Investigation concluded less than significant impacts with respect to earthquake rupture, strong seismic ground shaking, liquefaction, erosion, soil stability, and expansive soils. The Project site is susceptible to ground motion as a result of potential movement along faults in the region. However, the Approved Project would be required to design and construct the project in conformance to the most recently adopted California Building Code (CBC) design parameters. Conformance with these standards would ensure that no significant impacts related to ground shaking would occur.

In addition, the potential for surface ground rupture at the Project Site is considered low. The site-specific liquefaction analysis for the Project Site indicates that the site soils would not be prone to liquefaction during the ground motion expected during the design-based seismic event. Some seismically-induced settlement could occur at the Project site as a result of strong ground-shaking. However, due to the uniform nature of the underlying geologic materials, excessive differential settlements are not expected to occur. Therefore, Approved Project impacts related to ground failure, liquefaction, and instability would be less than significant. Furthermore, conformance with the City's current Building Code requirements would ensure that no significant impacts related to expansive soil would occur as a result of the Project.

The Site is completely developed with commercial and parking land uses. Considering that the Project site has already been developed, any paleontological resources at the site could have already been encountered.[24] In case of inadvertent discovery, any paleontological resources or sites, or unique geologic features shall be treated in accordance with State Law. Through compliance with the State's requirements, potential impacts to unknown paleontological resources or sites, or unique geologic features would be less than significant.

4.7.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

This analysis was based on an updated geotechnical investigation to account for the additional subterranean parking level, which increased depth of excavation, from 32 feet to approximately 40 feet. The Geotechnical Engineering Investigation had the following conclusion:[25]

> *Based upon the exploration, laboratory testing, and research, it is the finding of Geotechnologies, Inc. that construction of the proposed structure is considered feasible from a geotechnical engineering standpoint provided the advice and recommendations presented herein are followed and implemented during construction.*

24 Initial Study, September 2015, page IV-6.

25 Geotechnical Engineering Investigation, Geotechnologies, Inc., April 18, 2019.

As with the Approved Project, the Revised Project would be located on the same Project Site with the same ground and soil conditions. The Revised Project is not located a hillside area, methane area, special grading area, landslide area, liquefaction area, or preliminary fault rupture study area, and will not exacerbate existing soil conditions. The Revised Project would therefore similarly have a less than significant impact with respect to earthquake rupture, strong seismic ground shaking, liquefaction, erosion, soil stability, and expansive soil. The Initial Study and Draft EIR analysis adequately addresses the Revised Project. As with the Approved Project, the Revised Project is also subject to the LAMC, which includes specific requirements addressing seismic design, grading, foundation design, geologic investigations and reports, soil and rock testing, and groundwater. There is an existing regulatory process which necessitates the preparation of a final soils and geology report, which is reviewed by the Los Angeles Department of Building and Safety (Grading Division) prior to issuance of a grading permit. The supplemental Geotechnical Engineering Report for the Revised Project arrived at the same conclusions regarding building feasibility and soil conditions as the geotechnical report in the Draft EIR. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

The Revised Project would be at the same location as the Approved Project, however, it would have a slightly increased depth of excavation, from 32 feet to approximately 40 feet. The Revised Project would also be subject to the same regulatory standards as the Approved Project. If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety will be notified immediately, and all work will cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with Federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Through compliance with the State's requirements, potential impacts to unknown paleontological resources or sites, or unique geologic features would be less than significant. The Draft EIR analysis adequately addresses the Revised Project. No new analysis is needed. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.7.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to geology and soils. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.7.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to geology and soils. No substantial changes in the environment related to geology and soils have occurred since certification of the EIR, and no areas that are susceptible to geology and soil impacts have been identified within the vicinity of the Project Site that would result in new or more severe significant environmental impacts. Finally, as it has been determined the Revised Project will not result in any new impacts related to geology and soils or a substantial increase in previously identified impacts related to geology and soils, a review of feasible mitigation measures is not required.

4.7.5 Mitigation Measures Addressing Impacts

Since the EIR determined the Project would have a less than significant impact on geology and soils, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.7.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.8 Greenhouse Gas Emissions

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
GREENHOUSE GAS EMISSIONS: Would the project:					
(g) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant	No	No	No	No
(h) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant	No	No	No	No

This section is based on the following item, which is included as **Appendix D** to this Addendum:

D Air Quality and Greenhouse Gas Emissions Appendix, Noah Tanski Environmental Consulting, September 2019.

4.8.1 Impact Determination in the EIR

Construction of the Approved Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project Site. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Approved Project emission reductions are results of the Approved Project's commitments (e.g., project design features such as mixing of uses) and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS). The analysis quantifies the long-term operation emissions of GHG from the Approved Project. As one approach to assessing the Project's emissions, the analysis compares the Approved Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures (i.e., the No Action Taken (NAT) Scenario. This approach mirrors the concepts used in the CARB's Climate Change Scoping Plan for the implementation of AB 32. This methodology was used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The emissions for the Approved Project and its associated CARB 2020 NAT scenario were estimated to be 5,488 and 7,997 $MTCO_2e$ per year, respectively, which showed the Approved Project would reduce emissions by approximately 31 percent from the CARB 2020 NAT

scenario. Based on these results, the Approved Project demonstrates the efficacy of the implementing tools supporting GHG reductions plans.

The Approved Project would also support statewide GHG reduction goals and policies. The Approved Project's impact attributable to GHG emissions was also evaluated based on consistency with the following applicable regulatory plans and policies to reduce GHG emissions: Executive Orders S-3-05 and B-30-15; AB 32 Scoping Plan; SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy; City of Los Angeles ClimateLA implementation plan; City of Los Angeles Green Building Ordinance; and City of Los Angeles Mobility 2035 Plan. Based on the Draft EIR's evaluation, the Approved Project would be consistent with all feasible and applicable strategies recommended in the above stated plans.

Taken together, these strategies encourage providing a range of infill residential, shopping, entertainment and services all within a relatively short distance; providing housing and employment near current and planned transit stations and neighborhood commercial centers; supporting alternative fueled and electric vehicles; increasing efficiency; and reducing waste and consumption. As a result, the Approved Project would be consistent with applicable state, regional and local GHG reduction strategies. Given that the Approved Project would generate GHG emissions that demonstrate the efficacy of these plans and efforts, impacts would be less than significant.

4.8.2 Do Proposed Changes Involve New Significant Impacts?

For comparison purposes, the GHG emissions associated with the Approved Project and the Revised Project are included on **Table 4-5**. As shown, the Revised Project would result in increased construction and operation-related GHG emissions, due to its additional 119 residential units, modified commercial land usage, and additional construction requirements (i.e. additional excavation and concrete pouring due to the expanded depth of the parking garage, etc). It should be noted that neither CARB, SCQAMD, nor the City has adopted any quantitative significance thresholds for GHG emissions. CEQA requires GHG emissions for a project to be estimated and disclosed. Two additional factors are worth consideration:

- First, it is important to consider that the CalEEMod air quality modeling program has been revised twice since the formation of the Approved Project's EIR, and, generally speaking, CalEEMod's default emissions factors for construction equipment decrease over time to account for the increased penetration of newer, less-polluting equipment in the statewide construction vehicle fleet. Construction of the Revised Project is estimated to commence in July 2021, four years later than the estimated commencement of the Approved Project.

- Second, the equipment assumptions used to model the Revised Project's construction emissions generally exceed the assumptions used for the Approved Project. For example, the Revised Project assumes a total of nine grading equipment whereas the Approved Project assumes only seven. Additionally, the Revised Project assumes that all demolition, site preparation, grading, building construction, and paving equipment would operate for eight hours per workday, but the Approved Project assumes that some equipment would operate on reduced work schedules.

Table 4-5
Estimated Annual CO_2e GHG Emissions – Approved Project and Revised Project Comparison

Source	Annual Emissions – MT per year		
	Approved Project	Revised Project	Change
Area Sources	76	7[1]	-69
Energy Sources	1,428	2,593	+1,165[2]
Mobile Sources	3,474	4,829	+1,355[3]
Waste Sources	135	169	+34
Water Sources	279	375	+96
Construction	96	141	+45
Total Emissions	**5,488**	**8,114**	**+2,626**

MT = metric tons

[1] The Revised Project's noted decrease in area source GHG emissions is mostly due to the EIR's conservative assumption that each residential unit in the Approved Project could have included a gas fireplace. However, it has since been confirmed that residences would not include any fireplaces due to regulatory restrictions and project design, and the latest GHG modeling accounts for this.

[2] The Revised Project's increase in energy source GHG emissions is partly due to its additional 119 residential units and modified commercial land usage, but another major factor is that the EIR did not separately model the GHG emissions associated with the Approved Project's parking garage, as default CalEEMod assumptions for residential land uses already include parking assumptions. Modeling of the Revised Project's GHG emissions conservatively accounted for the proposed parking garage.

[3] The Revised Project's additional 119 residential units and modified commercial land usage would result in increased Project-related vehicle trips that would contribute to additional Project-associated mobile source GHG emissions.

Note: Daily construction emissions were amortized over a 30-year period pursuant to SCAQMD guidance. Annual construction emissions were derived by taking total emissions over the duration of activities and dividing by construction period.

Sources: DKA Planning 2016 (Appendix B1 of the Draft EIR) and NTEC 2019.

For informational purposes, **Table 4-6** compares the Revised Project's GHG emissions with a similar NAT scenario methodology that was utilized by the EIR. However, it should be noted that the Revised Project's later operational date (2024 versus 2019) would result in even greater GHG reductions primarily due to updated State renewable energy targets affecting the energy sources serving the Revised Project, more stringent Title 24 building efficiency standards, and other measures. For example, SB 100 has since revised the State's renewable resources targets to 44% by 2024, 52% by 2027, 60% by 2030, and 100% by 2045. Further, the City's Green New Deal commits LADWP, the Project's electricity provider, to supply 55% renewable energy by 2025 and 80% by 2036, exceeding the SB 100 targets. As a result, energy sources in particular would experience even greater GHG reductions from the NAT Scenario, beyond 42%.

Table 4-6
Estimated Annual CO_2e GHG Emissions – Reduction from NAT Scenario (MT per year)

Source	NAT Scenario	Revised Project Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	7	7	-	0%
Energy Sources	4,471	2,593	-1,877	-42%

Mobile Sources	6,899	4,829	-2,070	-30%
Waste Sources	169	169	-	0%
Water Sources	375	375	-	0%
Construction	141	141	-	0%
Total Emissions	**12,062**	**8,114**	**-3,947**	**-33%**
Net Emissions	**-**	**6,494**	**N/A**	**N/A**

Consistent with the EIR analysis, the NAT scenario does not assume a 30% reduction in mobile source emissions from Pavley emissions standards (19.8%), low carbon fuel standards (7.2%), and vehicle efficiency measures (2.8%). It also does not assume a 42% reduction in energy production emissions from the state's renewables portfolio standard (33%, per the State's previous 2020 target under SB 350), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).
Sources; DKA Planning 2016 and NTEC 2019.

The Revised Project would remain consistent with the latest applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. **Table 4-7** evaluates the Revised Project's consistency with applicable portions of CARB's 2017 *Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Scoping Plan Update), SCAG's 2016-2040 RTP/SCS, and the City of Los Angeles Green New Deal (Sustainable City pLAn 2019).

Table 4-7
Consistency Analysis – 2017 Scoping Plan Update

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increased the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.[a] However, the recently adopted SB 100 has since revised the State's renewable resources targets to 44% by 2024, 52% by 2027, 60% by 2030, and 100% by 2045.	CPUC, CEC, CARB	**Consistent.** The Project would use electricity provided by LADWP, which is required to meet the SB 350 and subsequent SB 100 and Green New Deal performance standards. In particular, the City's Green New Deal commits LADWP, the Project's electricity provider, to supply 55% renewable energy by 2025 and 80% by 2036, exceeding both the SB 350 and revised SB 100 targets. As required under SB 350, doubling the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Revised Project would comply with this this action/strategy by being located within the LADWP service area and complying with CalGreen and Title 24 energy efficiency standards. With regard to Title 24 energy efficiency standards, the 2019

		California Building Standards Code was recently published on July 1, 2019, with an effective date of January 1, 2020. Though these updated standards have yet to go into effect, they would apply to the Revised Project's construction, which would commence subsequent to the effective date. Residences built to the new 2019 standards will be approximately 7 percent more efficient than those built to the 2016 standards, which were themselves 28 percent more efficient (for electricity) than residences built to the 2013 Title 24 standards. Nonresidential buildings will be approximately 30 percent more energy efficient than those built to the 2016 standards.[b]
Implement Mobile Source Strategy (Cleaner Technology and Fuels) • At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. • Medium- and heavy-duty GHG Phase 2. • Innovative Clean Transit: Transition to a suite of to-be- determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO_x standard. • Last Mile Delivery: New regulation that would result in the use of low NO_x or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for	CARB, CalSTA, SGC, CalTrans CEC, OPR, Local agencies	**Consistent.** CARB approved the Advanced Clean Cars Program in 2012 that establishes an emissions control program for model year 2017 through 2025. Standards under the Advanced Clean Cars Program likely will apply to all passenger and light duty trucks used by customers, employees, and deliveries to the Revised Project, depending on the outcome of ongoing negotiations between CARB and EPA regarding federal standards. The Program also requires auto manufacturers to produce an increasing number of zero emission vehicles in the 2018 through 2025 model years. Extension of the Advanced Clean Cars Program has not yet been adopted, but it is expected that measures will be introduced to increase GHG emissions reductions stringency on light duty autos and continue adding zero emission and plug in vehicles through 2030. CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.[c,d] As implementation of the 2016-2040 RTP/SCS is expected to fulfill and exceed the region's obligations under SB 375, the Revised

class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030. • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document "Potential VMT Reduction Strategies for Discussion."		Project's consistency with the 2016-2040 RTP/SCS also ensures its consistency with SB 375. The Revised Project's consistency with the 2016-2040 RPT/SCS is discussed below.
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)	CARB	**Consistent** Under SB 375, CARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each region. As required under SB 375, CARB is required to update regional GHG emissions targets every 8 years. As part of the 2018 updates, CARB has adopted a passenger vehicle related GHG reduction of 19 percent for 2035 for the SCAG region, which is more stringent than the previous reduction target of 13 percent for 2035. As discussed, the Revised Project would be consistent with the 2016-2040 RTP/SCS and by extension SB 375.
Support Active Transportation Modes. By 2019, adjust performance measures used to select and design transportation facilities. Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection, etc.).	CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans	**Not Applicable.** The Revised Project would not involve construction of transportation facilities. However, the Revised Project would concentrate new development adjacent to Metro Line 2/302 and LADOT DASH Hollywood bus stops that are located at the intersection of Sunset Boulevard and Western Avenue. Both of these bus routes connect to the nearby Metro Red Line Station, located at the intersection of Sunset Boulevard and Vermont Avenue. The Revised Project's location within a HQTA would facilitate the use of mass transit, thereby resulting in a reduction of Project-related vehicle trips to and from the site.
Support low-GHG Transportation. By 2019, develop pricing policies to	CalSTA, Caltrans, CTC,	**Consistent.** The Revised Project would support this policy as code required parking

support low-GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	OPR/SGC, CARB	spaces would be consistent with the City's Green Building Code, which contains requirements for supporting electric vehicle charging stations. 21 EV stalls are proposed.
Implement California Sustainable Freight Action Plan: • Improve freight system efficiency. • Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	CARB	**Not Applicable.** The Revised Project's land uses would not include freight transportation or warehousing. Therefore, the Revised Project would not interfere with or impede the implementation of the Sustainable Freight Action Plan.
Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.	CARB	**Consistent.** This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Revised Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with LCFS. The previous LCFS, adopted in 2007, required a reduction of at least 10 percent in the carbon intensity (CI) of California's transportation fuels by 2020. On September 27, 2018, CARB amended the LCFS regulation to target a 20 percent reduction in CI from a 2010 baseline by 2030.
Implement the Short-Lived Climate Pollutant Strategy by 2030: • 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**Consistent.** Senate Bill 605 (SB 605) was adopted in 2014 and directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.[f] The Project would comply with the CARB SLCP Reduction Strategy, which limits the use of hydrofluorocarbons for refrigeration uses.
Waste Reduction. By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	CARB, CalRecycle, CDFA, SWRCB, Local air districts	**Not Applicable.** This strategy calls on regulators to reduce GHG emissions from landfills and is not applicable to a development project. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the

		2014 level by 2020 and 75-percent reduction by 2025.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	**Not Applicable.** This applies to State regulators and is not applicable to a development project. The current Cap-and-Trade program would end on December 31, 2020. Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.
Conservation. By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink: • Protect land from conversion through conservation easements and other incentives. • Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity. • Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments. • Establish scenario projections to serve as the foundation for the Implementation Plan.	CNRA and departments within, CDFA, CalEPA, CARB	**Not Applicable.** This applies to State regulators and is not applicable to a development project. This regulatory program applies to Natural and Working Lands, not directly related to development of the Revised Project. However, the Revised Project would not interfere with or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	**Not Applicable.** This applies to State regulators and is not applicable to a development project**.** This regulatory program applies to Natural and Working Lands, not directly related to development of the Revised Project. However, the Revised Project would not interfere with or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Implement Forest Carbon Plan	CNRA, CAL FIRE, CalEPA	**Not Applicable.** This applies to State regulators and is not applicable to a development project**.** This regulatory program applies to state and federal forest land, not directly related to development of the Revised Project. However, the Revised Project would not interfere with or impede implementation of the Forest Carbon Plan.

Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	**Not Applicable.** This applies to State regulators and is not applicable to a development project**.** Funding and financing mechanisms are the responsibility of the state and local agencies. The Revised Project would not conflict with funding and financing mechanisms to support GHG reductions.

[a] Senate Bill 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.
[b] CEC, 2019 Building Efficiency Standards Overview, March 2018.
[c] CARB, Advance Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acc/acc-mtr.htm.
[d] CARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), www.arb.ca.gov/msprog/actruck/actruck.htm.
[e] CARB, LCFS Rulemaking Documents, www.arb.ca.gov/fuels/lcfs/rulemakingdocs.htm.
[f] CARB, Reducing Short-Lived Climate Pollutants in California, www.arb.ca.gov/cc/shortlived/shortlived.htm.
[g] CARB, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, www.calrecycle.ca.gov/climate/slcp/.
Source: NTEC, 2019.

The Revised Project would be consistent with the 2016-2040 RTP/SCS' land use policies and strategies that are key to achieving GHG emissions reduction targets for 2035. The Revised Project would concentrate growth within a HQTA, providing residents, employees, and other users with convenient access to public transit, which would facilitate a reduction in VMT and corresponding vehicular GHG emissions. Compared to the Approved Project, the Revised Project's additional 119 dwelling units and 1,714 square feet of commercial area would further advance the smart growth goals of the 2016-2040 RTP/SCS by focusing additional density and growth within a HQTA. **Table 4-8** provides an evaluation of the Revised Project's consistency with applicable actions and strategies outlined in the 2016-2040 RTP/SCS.

Table 4-8
Consistency Analysis – 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local Jurisdictions.	**Consistent.** The Revised Project would contain a total of 412 residential units, including 351 market rate units and 61 units set aside for very low income households that would add to the supply of housing in metropolitan Los Angeles County.
Focus new growth around transit.	Local Jurisdictions.	**Consistent.** The Revised Project is an urban infill development located within a HQTA. The Revised Project would concentrate new development adjacent to Metro Line 2/302 and LADOT DASH Hollywood bus stops that are located at the intersection of Sunset Boulevard and Western Avenue. Both of these bus routes

		connect to the nearby Metro Red Line station located at the intersection of Sunset Boulevard and Vermont Avenue.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions.	**Consistent.** The Revised Project is an urban infill development located within a HQTA and would be consistent with the 2016-2040 RTP/SCS strategy of focusing growth near transit facilities and along the 2,980 miles of Livable Corridors in the region.
Provide more options for trips through Neighborhood Mobility Areas and Complete communities.	SCAG, Local Jurisdictions.	**Consistent.** The Revised Project is generally consistent with the Complete Communities strategy focusing on the creation of mixed-use districts in growth areas. The Revised Project proposes a mix of residential uses (including both market rate and very low income housing) and commercial/retail uses to be located in a HQTA. Additionally, the Revised Project is located in the vicinity of other mixed-use developments, such as the Views@270 complex located across from the Project at the northeast corner of Sunset Boulevard and Western Avenue.
Support local sustainable planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions.	**Not Applicable.** This strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities. The Revised Project would not interfere with such policymaking and would be consistent with policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG, Local Jurisdictions.	**Consistent.** The Revised Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
Transportation Strategies		
Preserve our existing transportation system.	SCAG, County Transportation commissions, Local Jurisdictions.	**Not Applicable.** While this strategy calls on investing in the maintenance of our existing transportation system, the Revised Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	SCAG, County Transportation Commissions, Local Jurisdictions.	**Consistent.** The Revised Project is an infill development that will minimize congestion impacts on the region due to its proximity to public transit, Complete Communities, and general density of population and jobs.
Promote safety and security in the transportation system.	SCAG, County Transportation Commissions, Local Jurisdictions.	**Not Applicable.** While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Revised Project would not interfere with such policymaking.

Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG, County Transportation Commissions, Local Jurisdictions.	**Not Applicable.** This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Revised Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emission vehicles.	SCAG, Local Jurisdictions.	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Revised Project would include 21 EV stalls and pre-wiring for additional future EV charging infrastructure.
Promote neighborhood electric vehicles.	SCAG, Local Jurisdictions.	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Revised Project would include 21 EV stalls and pre-wiring for electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG, Local Jurisdictions.	**Not Applicable.** While this strategy is designed to integrate new technologies for land-mile and alternative transportation programs, the Revised Project would not interfere with these emerging programs.
Source: NTEC, 2019.		

The Revised Project would also be consistent with the City's 2019 Green New Deal, which outlines goals and actions that the Mayor has established to reduce the generation and emission of greenhouse gases from both public and private activities. While not a plan adopted solely to reduce GHG emissions, within L.A.'s Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. **Table 4-9** provides an evaluation of the Revised Project's consistency with applicable actions and strategies of the Green New Deal.

Table 4-9
Consistency Analysis – Green New Deal

Action	Description	Project Consistency Analysis
Focus Area: Local Water		
Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050	The City would build upon the success of Save the Drop program and develop additional water conservation campaigns. In addition, the City would continue to benchmark customer use and improve data gathering to identify effective programs	**Consistent.** While this action primarily applies to the City and LADWP, the Revised Project would incorporate water conservation features to reduce water use.
Focus Area: Clean and Healthy Buildings		
All new buildings will be net zero carbon by 2030; and 100% of	The City would perform a complete building electrification study and develop supporting programs.	**Consistent**. While this action primarily applies to the City, the Project would be designed and

buildings will be net zero carbon by 2050	Financing would be expanded and improved to provide electrification existing energy efficiency and solar programs.	operated to meet or exceed the applicable requirements of the state Green Building Standards Code and the City of Los Angeles Green Building Code.
Reduce building energy use per sf for all building types 22% by 2025; 34% by 2035; and 44% by 2050	The City would increase awareness of incentives and smart building energy management systems. An energy consumption report will be prepared to assess the energy-water nexus.	**Consistent**. While this action primarily applies to the City, the Project would be designed and operated to meet or exceed the applicable requirements of the state Green Building Standards Code and the City of Los Angeles Green Building Code.
Focus Area: Housing and Development		
Ensure 57% of new housing units are built within 1500 ft of transit by 2025; and 75% by 2035	The City would develop regulatory tools and strategies to encourage transit ridership and focus growth in housing near the North Hollywood Station, Van Nuys Station, Sepulveda Station, Reseda Station, and Sherman Way Station. New stations would also be added to the Purple Line from Downtown L.A. to UCLA. This action reduces vehicle emissions by facilitating access to transit which can reduce single occupancy vehicle trips and help alleviate traffic congestion, and most importantly, reducing associated GHG emissions.	**Consistent**. While this action primarily applies to the City, the Project would concentrate new residential, office, and commercial retail uses in close proximity to public transit opportunities (e.g., light rail and bus routes), by utilizing City regulatory tools and incentives for increases in density in exchange for providing on-site affordable housing. The Project Site is also well served by public transit, including several Metro and DASH lines. The Project is also located nearby from the Metro B Line Hollywood/Western station.
Focus Area: Mobility and Public Transit		
Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050	The City would update the Transportation Demand Management (TDM) ordinance and develop first/last mile infrastructure improvements around transit stations. TDM strategies would also be implemented consistent with the West Side Mobility Plan to east congestion.	**No Conflict**. While this action primarily applies to the City, the Project would be located near mass transit stations to reduce vehicle trips and would be subject to the City's TDM ordinance. The Project would also promote a pedestrian-friendly community by placing residential, and commercial retail uses within walking distance to other residential retail and entertainment uses. The Project Site is located in an HQTA as designated by the 2016–2040 RTP/SCS. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors.
Increase the percentage	The City would increase the electric	**No Conflict**. The Project would

of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050	vehicle ownership by providing rebates for used EVs and chargers as well as promote trade-in events for electric vehicles. The City would also increase the number of EV charging stations by pursuing public-private partnerships in developing charging stations, streamline permitting processes for EV charger installations and update building codes to simplify EV charging requirements.	support this policy since the Applicant would provide electric vehicle charging stations and electric vehicle supply wiring consistent with the LAMC.
http://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf		

The 2019 update to the City's Sustainable City pLAn, The Green New Deal, revisits the aspirations and strategies laid out in the original 2015 document and adopts accelerated targets and goals to combat climate change via City-led initiatives and decision making. The Revised Project would generally align with and further City aspirations as the Revised Project would concentrate new growth in a HQTA, leveraging existing and growing transit facilities to reduce vehicle dependency and associated GHG emissions. The Revised Project's mixed-use nature and location along a designated Pedestrian Enhanced Network would also encourage alternative mode shares to reduce per capita VMT. The City's commitments related to renewable energy usage, water conservation, various waste reduction goals, and other initiatives would also benefit the Revised Project. A key goal of the Green New Deal is for LADWP to supply 55 percent renewable energy by 2025, which would exceed the SB 100 target of 50 percent. In addition, the plan sets goals to ensure 57% of new housing units are built within 1,500 feet of transit by 2025 and to reduce Vehicle Miles Traveled per capita by at least 13% by 2025. As an infill mixed-use development in a HQTA and with transit access, the Revised Project also supports these goals.

As discussed, the Revised Project would be consistent with the latest applicable plans, policies, and regulations. The Revised Project's construction and operations-related GHG emissions are increased when compared to the Approved Project; however, there is no "bright line" quantitative threshold of significance for GHG emissions. The Revised Project contains an additional 119 dwelling units and 1,714 square feet of commercial area and thus, predictably, would result in greater mass GHG emissions. However, the Revised Project implements current smart growth and land use planning best practices to reduce per capita GHG emissions by concentrating household and employment growth, and density, within HQTAs. By increasing the site's residential and commercial density, the Revised Project would provide additional users, whether residents, employees, or retail customers, with opportunities to utilize the location's transit opportunities. For these reasons, the Revised Project would not result in any new or substantially more severe greenhouse gas impacts, and the Revised Project would not conflict with any applicable plan, policy, or regulation with the goal of reducing GHG emissions.

4.8.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in any new or substantially increased significant impacts beyond those already identified in the previous adopted EIR relative to greenhouse gas emissions. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.8.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to GHG emissions. No substantial changes in the environment related to GHG emissions have occurred since certification of the EIR that would result in new or more severe significant environmental impacts. Finally, as it has been determined the Revised Project will not result in any new impacts related to GHG emissions or a substantial increase in previously identified impacts related to GHG emissions, a review of feasible mitigation measures is not required.

4.8.5 Mitigation Measures Addressing Impacts

Since the EIR determined the Project would have a less than significant impact on GHG emissions, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.8.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.9 Hazards and Hazardous Materials

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
HAZARDS AND HAZARDOUS MATERIALS: Would the project:					
(a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant	No	No	No	No
(b) Create a significant hazard to the public or the environment through the reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?	Less than Significant with Mitigation	No	No	No	Yes
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact	No	No	No	No
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No Impact	No	No	No	No
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	No	No	No	No
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No Impact	No	No	No	No
(g) Expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	No Impact	No	No	No	No

4.9.1 Impact Determination in the EIR

The Project includes development of the Project Site with typical commercial and residential land uses similar to those already found in the Project area that would use common types of

cleaning products, paint, petroleum products, etc. The Project would not require the transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. The Project Site is not included on any list compiled pursuant to Government Code Section 6892.5. The Project Site is not located within two miles of a public airport or private airstrip. The Project is located within dense urban area and is not located within or near any areas susceptible to wildland fires. As stated in the Draft EIR (page IV.E-7) SEG's Phase I Environmental Site Assessment (ESA) also concluded that with exception to the potential for asbestos-containing materials (ACMs) and lead-based paint (LBP), no Recognized Environmental Concerns (RECs) exist at the Project Site. SEG confirmed the conclusions of the Phase II ESA that no Underground Storage Tanks (USTs) exist at the Project site or any associated soil contamination.

During demolition of the existing building, it is possible that construction workers could come into contact with hazardous materials in the form of ACMs and LBP. Therefore, Project impacts related to hazardous materials would be potentially significant. With implementation of Mitigation Measures E-1 and E-2, impacts related to hazards and hazardous materials would be mitigated to a less than significant level.

4.9.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would include the same development program as the Approved Project on the same location. The Revised Project would not require the transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. The Project Site is not included on any list compiled pursuant to Government Code Section 6892.5. The Project Site is not located within two miles of a public airport or private airstrip. The Project is located within dense urban area and is not located within or near any areas susceptible to wildland fires. As stated in the Draft EIR (page IV.E-7), SEG's Phase I ESA also concluded that with exception to the potential for asbestos-containing materials (ACMs) and lead-based paint (LBP), no Recognized Environmental Concerns (RECs) exist at the Project Site. SEG confirmed the conclusions of the Phase II ESA that no USTs exist at the Project site or any associated soil contamination.

The Revised Project would also demolish the existing building. The Draft EIR Mitigation Measures E-1 and E-2 restate existing regulations for asbestos abatement and surveying and handling of lead-based paint. The Revised Project would similarly comply with all required regulations that govern abatement and removal of ACMS and LBP. Through compliance with the requirements, the removal of potential ACMs and LBP would be less than significant. The Draft EIR analysis adequately addresses the Revised Project. No new analysis is needed. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.9.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to hazards and hazardous materials. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.9.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to hazards or hazardous materials not discussed in the EIR, significant effects related to hazards or hazardous materials previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.9.5 Mitigation Measures Addressing Impacts

The mitigation measures adopted by the Final EIR are listed below:

E-1: Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no ACMs are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

E-2: Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a LBP survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

The Revised Project would also comply with these mitigation measures, and the Revised Project will comply with all applicable regulatory requirements.

4.9.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.10 Hydrology and Water Quality

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
HYDROLOGY AND WATER QUALITY: Would the project:					
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	No Impact	No	No	No	No
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No Impact	No	No	No	No
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
(i) Result in substantial erosion or siltation on- or off-site?	Less Than Significant	No	No	No	No
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less Than Significant	No	No	No	No
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less Than Significant	No	No	No	No
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No Impact	No	No	No	No
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No Impact	No	No	No	No

4.10.1 Impact Determination in the EIR

The Project site is completely developed with impervious surfaces. Project runoff would be directed to the existing local storm drain system and would have no affect on groundwater supplies or recharge. The Project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood

hazard delineation map. The Project site is not in an area susceptible to seiches, tsunamis, or inundation.

During storm events all runoff from the Project site flows to the City's local storm drain infrastructure. The Project would not increase the amount of impervious surfaces at the Project site and would not increase runoff from the Project site. Additionally, the Project developer would be required to implement BMPs and to develop appropriate drainage infrastructure on the site to meet regulatory water quality requirements and to control drainage from the Project site to not exceed existing rates. As such, the Project would not create or contribute runoff water that would exceed the capacity of the existing storm drain system. Therefore, Project impacts related to storm drain capacity would be less than significant.

To address water quality during the Project's construction phase, the Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, Project construction impacts related to water quality would be less than significant.

During the Project's operation phase, in accordance with the City's Low Impact Development (LID) Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the Project would meet or exceed the City's water quality standards. As such, the Project would not conflict with or obstruct any water quality control plans. Considering that the Project site is almost completely developed with a building and a surface parking lot, which collects a myriad of pollutants associated with parked cars that flow into the stormdrains during a storm event, the Project's change of land uses at the Project site development of new stormwater pollution control measures at the site likely would improve the quality of water coming of the Project site. Therefore, Project impacts related to operational water quality would be less than significant.

4.10.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would be on the same site and have the same building footprint as the Approved Project. Project runoff would be directed to the existing local storm drain system and would have no affect on groundwater supplies or recharge. The Project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. The Project site is not in an area susceptible to seiches, tsunamis, or inundation.

The Revised Project would also be subject to the same regulations governing water supply and quality, such as NPDES requirements, City grading regulations, and the City's LID Ordinance, and would therefore also meet or exceed the City's water quality standards. The Revised Project would also not increase the amount of impervious surfaces at the Project site and would not increase runoff from the Project site. The relevant revision is non-substantive. The Draft EIR analysis adequately addresses the Revised Project. No new analysis is needed. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.10.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to hydrology and water quality. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.10.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to hydrology and water quality not discussed in the EIR, significant effects related to hydrology and water quality previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.10.5 Mitigation Measures Addressing Impacts

Since the EIR determined the Project would have a less than significant impact on hydrology and water quality, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.10.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.11 Land Use and Planning

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
LAND USE AND PLANNING: Would the project:					
(a) Physically divide an established community?	No Impact	No	No	No	No
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	No	No	No	No

4.11.1 Impact Determination in the EIR

The Project Site is developed and located in a dense urban area of the City. Thus, the Project would not physically divide an established community. The Approved Project would be consistent with applicable land use policies of SCAG's Compass Blueprint Report, the applicable SCAG's 2008 Regional Comprehensive Plan policies, the 2016-2040 RTP/SCS, the General Plan Framework Element, General Plan Health and Wellness Element land use policies, Housing Element, Hollywood Community Plan, the Station Neighborhood Area Plan (SNAP), the Zoning Code, and Do Real Planning principles. Therefore, impacts related to inconsistency with land use plans and policies would be less than significant.

4.11.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would be on the same site and have the same land uses (residential and commercial) as the Approved Project. Modifications to the Approved Project include an increase of 119 residential units to 412 units, including 46 more affordable units. In addition the building height would increase one additional story and 15 feet more in building height. Ground floor commercial uses would increase by 1,714 square feet to 35,694 square feet, with the change coming from a reduced grocery store and an increased retail/restaurant space.

In total, the Revised Project would add an additional 112,299 square feet more of floor area to the Project Site. The Revised Project requests additional relief from the SNAP requirements to allow 4.5:1 FAR instead of 3:1 FAR, to allow a 95 foot building height instead of the maximum 75 feet allowed, and to permit 169 commercial parking spaces instead of the permitted maximum of 71 spaces. The FAR and height requests are similar to the Approved Project's entitlement requests, albiet for more height and FAR to primarily allow for the additional housing density. While these changes under the Revised Project would generally increase density and

height at the Project Site, as compared to the Approved Project, the additional housing units, including affordable housing units, would also further the City's goals to increase density near transit, consistent with City policies for transit-oriented development and reducing VMT and vehicle emissions.

The changes to the land uses and sizes under the Revised Project do not affect project consistency with the Hollywood Community Plan. The existing land use designation for the Project site in the adopted Hollywood Community Plan is Highway Oriented Commercial, which corresponds with the existing C2 zoning for the Project site. The land uses included as part of the Revised Project are consistent with the land use designation for the Project site. Similar to the Approved Project, the Revised Project would be substantially consistent with all applicable standards, criteria, and policies of the Hollywood Community Plan.

The Project is in Subarea C (Community Center) and is a mixed use project according to the definition provided in Section 4 of the SNAP.[26] The purpose of Subarea C is to create a denser, livelier pedestrian environment along the major commercial and transit corridors like Hollywood Boulevard, Sunset Boulevard, Santa Monica Boulevard and Vermont Avenue, near each of the four subway stations. The mix of uses in this area includes multi-family residences, community serving retail, workshops and offices. The maximum height for the subarea is 75 feet, with certain exceptions for hospital developments. All of the ground floor frontage in Subarea C must be for commercial or nonresidential uses that are community serving, like child care or libraries, etc. Pedestrian arcades or mid-block pass throughways are required for projects with more than 250 feet of lot frontage along a major or secondary highway.

The Revised Project would continue to be substantially consistent with the applicable standards of the SNAP. The Revised Project would have the same mix of uses as the Approved Project. Similar to the Approved Project, the Revised Project is requesting additional deviations for height and FAR. The Revised Project would provide the required minimum quantity of bicycle and vehicle parking spaces and open space. Through the current approval process, the City would ensure that the Revised Project complies with all other applicable development standards.

Therefore, the Revised Project would continue to be substantially consistent with applicable land use plans and policies. The Draft EIR analysis adequately addresses the changes in the Revised Project. No new analysis is needed. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.11.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

[26] Any Project which combines a commercial use with a residential use, either in the same building or in separate buildings on the same lot or lots in a unified development.

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken that would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to land use and planning. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.11.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to land use not discussed in the EIR, significant effects related to land use previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.11.5 Mitigation Measures Addressing Impacts

Since the EIR determined the Project would have a less than significant impact on land use, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.11.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.12 Mineral Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
MINERAL RESOURCES: Would the project:					
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	No	No	No	No
(b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on local general plan, specific plan or other land use plan?	No Impact	No	No	No	No

4.12.1 Impact Determination in the EIR

There are no known mineral resources on the Project Site or in the vicinity. The Project Site is not identified as a mineral resource recovery site. Therefore, no impacts related to this issue would occur.

4.12.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would be on the same site as the Approved Project. No new analysis is needed. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.12.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to mineral resources. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.12.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to mineral resources not discussed in the EIR, significant

effects related to mineral resources previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.12.5 Mitigation Measures Addressing Impacts

Since the EIR determined the Project would have no impact on mineral resources, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.12.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.13 Noise

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
NOISE: Would the project result in:					
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant with Mitigation	No	No	No	Yes
(b) Generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant	No	No	No	No
(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	No

This section is based on the following item, which is included as **Appendix F** to this Addendum:

F Noise Appendix, Noah Tanski Environmental Consulting, July 2019.

4.13.1 Impact Determination in the EIR

During demolition, construction, ground clearing, grading, structural, and other Project construction phases, noise-generating activities would occur at the Project site between the hours of 7:00 AM and 9:00 PM in accordance with the LAMC. Construction activities would generate noise from a variety of on- and off-site activities, and would include the use of on-site heavy equipment such as excavators and loaders, as well as smaller equipment such as saws, hammers, and pneumatic tools. Secondary noise could also be generated by construction worker vehicles and vendor deliveries.

Given the ambient conditions in the Project area and the proximity of receptors, significant noise impacts could potentially occur at each of the monitored sensitive receptor locations during construction of the Project, as follows:

- 5521 Harold Way, Residences, north of the Site, are projected to experience noise levels of up to 79.6 dBA, an increase of 11.4 dBA. These elevated noise levels would exceed the 5 dBA noise increase considered to be a noise violation by the LAMC.

- 1516 Western Avenue, Views@270 Apartments, east of the Site, are projected to experience noise levels of up to 77.6 dBA, an increase of 6.8 dBA. These elevated noise levels would exceed the 5 dBA noise increase considered to be a noise violation by the LAMC.

- 5520 Harold Way, Vinewood Community Correctional Center, north and west of the Site, is projected to experience noise levels of up to 82.2 dBA, an increase of 21.5 dBA. These elevated noise levels would exceed the 5 dBA noise increase considered to be a noise violation by the LAMC.

- 1544 St. Andrews Place, Residences, west of the Site, are projected to experience noise levels of up to 82.3 dBA, an increase of 18.3 dBA. These elevated noise levels would exceed the 5 dBA noise increase considered to be a noise violation by the LAMC.

Additionally, construction noise levels would exceed the City's 75 dBA limit for powered construction equipment within 500 feet of a residential zone. Therefore, Project construction noise impacts would be potentially significant.

Implementation of Mitigation Measures H-1 through H-7 would reduce the Project's noise impact from on-site construction activity to less than significant levels, through the posting of notices, construction equipment muffling and distancing, usage of noise shed, installation of temporary noise barriers, and haul truck routing away from residential neighborhoods. As shown on Table IV.H-13 of the Draft EIR, implementation of the Project mitigation measures (specifically, Mitigation Measures H-3 through H-6) would reduce ambient noise increases at all receptors to below the LAMC's 5 dBA threshold of significance. These measures would also reduce construction noise to below LAMC's 75 dBA limit for powered equipment operations within 500 feet of residential zones.

Project buildout would require the demolition of existing structures, as well as the excavation of cut materials to construct the proposed subterranean parking garage. However, maximum haul truck deployment likely would not exceed an average of more than 10 trips per hour during any construction phase. With regard to off-site construction-related noise impacts, haul trucks would remove cut and demolished materials from the Project site during various construction phases and would transport these materials to regional landfills via a haul route that could expose roadway-adjacent receptors to noise from these heavy-duty vehicles. While such vehicle activity would marginally increase ambient noise levels along the haul route, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at haul route-adjacent land uses, and off-site construction noise impacts would be less than significant.

During Project operations, the development would produce both direct noise impacts on the site from residential and commercial-related activities, as well as indirect noise impacts from vehicles traveling on local roads to access the site. The direct impacts would include noise generated from the following: mechanical equipment, landscape maintenance, commercial retail land use activities, auto-related activities, residential land uses, and truck deliveries. These direct sources of on-site noise would generate impacts on a seasonal, irregular, or infrequent

basis and would not individually or collectively elevate ambient noise levels substantially at nearby sensitive receptors. The potential noise impact from these on-site operational sources would be less than significant. The majority of the Project's operational noise impacts would be from indirect noise impacts associated with the 2,562 net new daily vehicle trips it would generate.[27] As shown on Tables IV.H-7 and IV.H-8 of the Draft EIR, the greatest Project-related noise increase would be 1.3 dBA from eastbound Harold Way to St. Andrews Place in the P.M. peak hour. This increase in ambient noise would be below the 5 dBA necessary to be considered noticeable by the public at large.

Ground-borne vibration would be generated by a number of on-site construction activities. As a result of drilling/boring activities for cast-in-place pile placement, vibration velocities of up to 0.148 inches per second PPV are projected to occur at St. Andrews Place Residences, the nearest off-site sensitive receptor. This is below the 0.5 inches per second PPV threshold that is considered potentially harmful to nearby residential structures. As shown on Table IV.H-9 of the Draft EIR, more distant receptors would experience even lower ground velocities. Other potential activities would produce even less vibration and have lesser potential impacts on nearby sensitive receptors. As a result, construction-related structural vibration impacts would not damage adjacent buildings and would be less than significant.

During operation of the Project, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicular travel on the local roadways. Project-related traffic would expose nearby land uses and other sensitive receptors during long-term operations to vibration levels far below levels associated with landuse disruption and would be considered less than significant.

The Project Site is not located within two miles of a public or private airport. The closest airport is the Bob Hope Airport located approximately 8.6 miles northwest of the Site. Thus, the Project would not expose people residing or working in the Project area to excessive noise from an airport or airstrip. Therefore, no impacts would occur.

4.13.2 Do Proposed Changes Involve New Significant Impacts?

The Revised Project's additional 119 residential dwelling units and 1,714 square feet of commercial area and increased excavation depth would extend the Approved Project's construction schedule by approximately eight months. Specifically, the grading phase would be extended by approximately five months, and construction activities would take place six days a week, rather than the original five days a week assumed for the Approved Project. The number of daily truck trips would remain unchanged under the Revised Project. The building construction and architectural coatings phases would not extend in duration, but their related construction activities would also take place six days a week, rather than the original five days a week assumed for the Approved Project. Unlike for the Approved Project, no overlap of construction phases is anticipated or required.

[27] Overland Traffic Consultants, Traffic Impact Analysis, December 2015.

The following analysis is provided to evaluate the construction noise impacts of the Revised Project in accordance with the latest guidance and methodologies:

Noise-Sensitive Receptors

Noise-sensitive land uses in the vicinity of the Revised Project include the same uses as the Approved Project, which includes residential land uses to the north along Harold Way, residential land uses to the west along St. Andrews Place, and a mixed-use residential development near the intersection of Sunset Boulevard and Western Avenue. The EIR analysis identified the following specific sensitive receptors for detailed construction noise analysis in order to ascertain the Approved Project's potential to result in significant construction noise impacts:

- 5521 Harold Way Residences, a multi-family residential complex located 70 feet north of the Project Site.
- Views@270 Apartments, a multi-family residential mixed-use complex located at 1516 N. Western Avenue, 95 feet east of the Project Site.
- Vinewood Community Correctional Center, a live-in type treatment facility located at 5520 Harold Way, directly northwest of the Project Site.
- St. Andrews Place Bungalows, a small-lot residential complex located directly west of the Project Site.

Since the formation of the EIR, no additional noise-sensitive receptors have been constructed or developed in the vicinity of the Project site.

To establish current ambient noise conditions in the vicinity of the Project site, on June 20, 2019, daytime noise levels were measured at the above four receptors. As shown below in **Table 4-10**, current daytime ambient noise levels are not substantially different than those measured in 2016. Environmental noise is dynamic; the small differences in measured noise levels are likely due to fluctuations in vehicle traffic and the resultant statistical error between samples.

Table 4-10
Existing Noise Levels

Noise Measurement Location	Sound Levels (dBA, Leq)	
	2016 EIR	2019
5521 Harold Way Residences	68.2	67.0
Views@270 Apartments	70.8	70.8
Vinewood Community Correctional Center	60.7	59.7
St. Andrews Place Bungalows	64.0	61.4
Source: DKA Planning 2016 and NTEC 2019.		

On-Site Construction Noise Sources

The Revised Project's on-site construction noise impact would be considered significant if its construction noise emissions would exceed the 75 dBA at 50 feet maximum noise level limit for powered equipment as established by Section 112.05 of the LAMC. This regulation applies to the on-site operations of powered construction equipment and not to road-legal trucks operating on public rights-of-way.

Regulatory compliance with LAMC Section 112.05 would ultimately limit any noise levels from powered construction equipment to 75 dBA at 50 feet or below. Standard, industry-wide "best practices" for construction in urban or otherwise noise-sensitive areas would ensure that the Revised Project's powered construction equipment noise levels do not exceed the 75 dBA at 50 feet threshold of significance. "Best practices" utilized by the Revised Project would conform to the EIR's previously adopted Mitigation Measures H-1 through H-7.[28] However, in light of the Revised Project's extended schedule and additional work days, in addition to new information regarding the site layout and Project design, the EIR's sound barrier requirements have been revised to provide increased sound attenuation and conform to the latest best practices. These "best practices" are incorporated as revisions to the previously adopted Mitigation Measures in order to ensure compliance with required regulations, as noted in **Table 4-11**.

Prior to mitigation, the Revised Project's noise from on-site construction sources would be no different from that of the Approved Project, and some pieces of equipment would exceed the 75 dBA at 50 feet maximum noise level limit for powered equipment. The Revised Project would utilize the same mix of equipment, and distances to receptors would be unchanged. The only differences would be as follows: First, as noted and shown above, the most recently measured ambient noise levels for nearby sensitive receptors are slightly lower than those measured in 2016 for the Approved Project's EIR, but they are within the bounds of expected sample-to-sample variance and demonstrate that current daytime noise levels are not materially different. Second, though the duration of construction for the Revised Project would be extended due to additional construction requirements, this would have no bearing on the significance of its construction noise impact, as duration of impact is not a criterion for any regulation or threshold of significance. Though the Revised Project would require the excavation of an additional subgrade level and result in increased soil export, equipment mix and usage would remain the same – only the duration of activities would be extended. Further, the increased depth of excavation would not result in increased noise impacts. The construction of an additional building level (the Revised Project would be six stories tall, one greater than the Approved Project) also would not result in increased noise impacts. Construction activities at above-grade elevations would utilize smaller equipment that generate substantially less noise than heavy equipment and diesel-powered construction vehicles that operate at or below grade. The Revised Project's additional Saturday construction requirements also would not result in increased construction noise impacts, as there is no applicable regulation or threshold that imposes stricter noise standards for Saturday construction. The noise limits instituted by LAMC Section 112.05 would apply similarly to Saturday construction.

[28] Current instruction regarding Section 112.05-based analyses is that practices and measures to achieve compliance with Section 112.05 should be considered regulatory compliance measures or best practice measures, as compliance with Section 112.05 is compulsory as a matter of regulatory compliance.

Table 4-11
Comparison of Final EIR Mitigation Measures and Revised Project Mitigation Measures

Final EIR	Revised Project	Notes
H-1: The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.	**H-1:** The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.	No change.
H-2: Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.	**H-2:** Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.	No change.
H-3: All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance.	**H-3:** Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.	Though Mitigation Measure H-3 removes the performance standard from exhaust mufflers, this would not compromise or elevate the Project's construction noise impact, especially as sound barrier requirements have been revised to provide additional height, which would improve their effectiveness. Equipment would still be equipped with the appropriate mufflers according to manufacturers' specifications. In the past, equipping older construction equipment with aftermarket mufflers was shown to reduce noise levels by 3 dBA at 50

		feet. Now, most new equipment come equipped with such systems from the factory. It is no longer appropriate to claim that aftermarket muffling systems will be installed on construction vehicles. They come pre-equipped, and the latest reference noise level databases account for this.
H-4: All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent noise-sensitive land uses.	**H-4:** All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent noise-sensitive land uses.	No change.
H-5: Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.	**H-5** Generators, compressors, and other noisy equipment shall be placed within acoustic enclosures or behind baffles or screens, especially when such equipment has line of sight to nearby noise-sensitive receptors and/or are not located within the confines of the Revised Project's perimeter sound barriers.	The Revised Project's Mitigation Measure H-5 is functionally the same as its previous iteration, but has been edited to include additional detail and stronger language.
H-6: Temporary sound barriers shall be installed as specified: • A temporary sound barrier no less than 8 feet in height shall be erected to block line-of-sight noise travel from the Project site to 5521 Harold Way Residences and other neighboring residences along Harold Way This barrier shall extend along the northern boundary of the Project site to prevent on-site construction noise from diffracting around its ends. • A temporary sound barrier no less than 8 feet in height shall be erected to block line-of-sight noise travel from the Project site to Vinewood Community Correctional Center and other	**H-6** Temporary sound barriers shall be erected along all northern Project boundaries to obstruct line of sight noise paths to sensitive receptors located along Harold Way. These sound barriers shall be constructed of materials capable of achieving a noise reduction of at least 15 dBA. At all other Project boundaries, temporary sound barriers no less than 8 feet in height shall be erected. These sound barriers shall be constructed of materials capable of achieving a noise reduction of at least 15 dBA. Temporary sound barrier "penalty boxes" shall be erected for truck-mounted cranes, concrete pumping trucks, concrete mixing trucks, and other construction-related vehicles that may be permitted to temporary operate from adjacent on-street parking spaces or public right of way,	**Changes to Mitigation Measure H-6** updates the Revised Project's sound barrier system as it would ensure that sound barriers obstruct line of sight noise paths to nearby sensitive receptors. In some cases this would require sound barriers to be taller than the previous 8-foot criteria. H-6 also institutes an additional noise management practice whereby any construction equipment operating from public right of way and on-street parking spaces would be required to be shielded by sound barriers. Finally, H-6 outlines an alternative measure where existing masonry walls may be utilized to function as sound barriers, provided that they match or exceed the height specifications that would be required to obstruct line of sight noise paths to nearby receptors. Masonry walls are generally capable of greater attenuation than typical temporary noise barrier systems.

neighboring residences to the Project's northwest. This barrier shall be constructed in such a way so as to have a surface weight of four pounds per square foot or greater, and the Project-facing side shall be lined with exterior grade acoustical blankets to provide additional sound absorption. This barrier shall extend along the Project's north and west-facing boundaries adjacent to Vinewood Community Correctional Center to prevent on-site construction noise from diffracting around its ends. • A temporary sound barrier no less than 8 feet in height shall be erected to block line-of-sight noise travel from the Project site to St. Andrews Place Residences and other neighboring residences along St. Andrews Place. This barrier shall extent along the western-most boundaries of the Project site to prevent on-site construction noise from diffracting around its ends. At all other Project boundaries, temporary noise barriers no less than 7 feet in height shall be erected to prevent Project construction operations from exceeding LAMC's 75 dBA limit for construction noise within 500 feet of residential zones.	outside the confines of the Project's perimeter sound barriers. The sound barriers forming the "penalty boxes" shall be constructed of materials capable of achieving a noise reduction of at least 10 dBA. Alternatively, where existing masonry walls occur along the Project's property lines, and where these walls match or exceed the height specifications outlined above, these walls may be maintained throughout the Project's construction phases to function as sound barriers.	Rather than mandate a singular barrier across the entirety of the boundary, the revised measures would exceed the performance of the previous mitigation by instituting a 15 dBA performance standard for the wall material(s). The "penalty box" barriers will remain at 10 dBA reduction – these are generally lighter units that are designed to be easily moved by work crews or skid steer loaders/forklifts. Diffraction around the ends of noise barriers would not be a concern, as the entire site would be wrapped in barriers.
H-7: A haul route for exporting cut materials from the site shall access the Hollywood Freeway	**H-7:** A haul route for exporting cut materials from the site shall access the Hollywood Freeway	No change.

via Western Avenue, Hollywood Boulevard, Sunset Boulevard, or other major arterials. The route shall avoid traveling on residential streets, especially those passing through the neighborhood directly to the Project's north and west.	via Western Avenue, Hollywood Boulevard, Sunset Boulevard, or other major arterials. The route shall avoid traveling on residential streets, especially those passing through the neighborhood directly to the Project's north and west.	
CAJA Environmental Services, 2020.		

As shown in **Table 4-12**, these Mitigation Measures would ensure that the Revised Project's powered equipment noise levels would not exceed the 75 dBA at the 50 foot limit that is established by LAMC Section 112.05 and recommended as the threshold of significance by the City of Los Angeles Department of Planning. Therefore, because the Revised Project would comply fully with LAMC Section 112.05 through the implementation of the above Mitigation Measures, its construction noise impact from on-site sources would subsequently be considered less than significant and would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR. In addition, **Table 4-12** shows the increased effectiveness of the revised Mitigation Measure H-6, which would enhance the Project's perimeter noise barriers and impose additional requirements for construction equipment that may operate outside or above the confines of perimeter noise barriers. For informational purposes, it also shows the Approved Project's construction equipment noise levels, both prior to and after mitigation, for comparison.

Table 4-12
Revised Project Construction Noise Levels – Comparison Between Approved Project and Revised Project Noise Barrier Mitigation and Effectiveness

Powered Construction Equipment	dBA L_{eq} 1-hour at 50 feet Before MM	Noise Barrier Attenuation		dBA L_{eq} 1-hour at 50 feet After MM		Consistent with LAMC Sec.112.05?
		AP	RP	AP	RP	
Auger Drill Rig	82.8	-10	-15	72.8	67.8	Yes
Backhoe	73.6	-10	-15	63.6	58.6	Yes
Compactor (ground)	76.2	-10	-15	66.2	61.2	Yes
Compressor (air)[A]	73.7	-5	-5	68.7	68.7	Yes
Concrete Mixer Truck[B]	74.8	0	-10	74.8	64.8	Yes
Concrete Pump Truck[B]	74.4	0	-10	74.4	64.4	Yes
Concrete Saw	85.0	-10	-15	75.0	70.0	Yes
Crane	72.6	-10	-15	62.6	57.6	Yes
Truck-Mounted Crane[B,C]	83.0	0	-10	83.0	73.0	Yes
Dozer	77.7	-10	-15	67.7	62.7	Yes
Drill Rig Truck[B]	72.2	0	-10	72.2	62.2	Yes
Excavator	76.7	-10	-15	66.7	61.7	Yes
Front End Loader	75.1	-10	-15	65.1	60.1	Yes
Generator	77.6	-10	-15	67.6	62.6	Yes
Generator (<25KVA)[B]	69.8	-5	-5	64.8	64.8	Yes
Gradall	79.4	-10	-15	69.4	64.4	Yes

Grader	81.0	-10	-15	71.0	66.0	Yes
Jackhammer	81.9	-10	-15	71.9	66.9	Yes
Paver	74.2	-10	-15	64.2	59.2	Yes
Roller	73.0	-10	-15	63.0	58.0	Yes
Scraper	79.6	-10	-15	69.6	59.6	Yes
Welder/Torch[A]	70.0	-5	-5	65.0	65.0	Yes

AP = Approved Project RP = Revised Project

[A] The selected equipment may be operated outside or above the confines of the required perimeter noise barriers. Mitigation Measure H-5 would ensure that such equipment are still placed within acoustic enclosures or shielded by baffles or screens.

[B] The selected equipment may be operated outside the confines of the required perimeter noise barriers but would be shielded by the "penalty box" barriers pursuant to Mitigation Measure H-6.

[C] Truck-mounted crane noise level sourced from the FTA's Transit Noise and Vibration Impact Assessment manual, as this equipment is not represented in FHWA RCNM 1.1.

Source: Noise levels derived from the Federal Highway Administration's Roadway Construction Noise Model, version 1.1 (FHWA RCNM 1.1).

Overall, the Revised Project would utilize a similar mix of construction equipment as the Approved Project. On a daily basis, construction activities for the Revised Project would be similar to the Revised Project, and the "conservative scenario" analyzed in the EIR would remain the same. The footprint of the Revised Building would also be similar to the Approved Project, so construction activities would not occur at any lesser distances than analyzed in the EIR, which could otherwise result in increased construction noise levels at nearby sensitive receptors. The Revised Project's construction noise impacts would be considered less than significant after the incorporation of the above measures. Since construction noise impacts are based on thresholds for temporary noise increases rather than daily or long-term noise levels, the extension of construction phases or the addition of extra work days would not increase the Revised Project's impact with respect to the threshold.

Off-Site Construction Noise Sources

The Revised Project's total amount of exported soils would increase from 78,270 cubic yards (CY) to 175,000 CY. This would necessitate an additional 2,716 haul trips over the course of the grading phase (the Revised Project would require 14 CY capacity haul trucks, rather than the previously assumed 8 CY haul trucks). However, due to the five-month extension of the grading phase, the Revised Project would result in approximately 63 haul trips per day, compared to the Approved Project's estimated 148 haul trips per day. As a result, the Approved Project's daily off-site construction noise impact from haul trucks would decrease. The Revised Project would adhere to the haul route restrictions outlined in the Final EIR's Mitigation Measure H-7, which has been discussed above. As stated above, though the duration of construction for the Revised Project would be extended due to additional construction requirements (such as longer period for grading), this would have no bearing on the significance of its construction noise impact, as duration of impact is not a criterion for any regulation or threshold of significance.

Since the Revised Project includes the same mix of uses as the Approved Project, the types of operational noises associated with the Revised Project would be the same. Overall, the Revised

Project's on-site operational noise sources would not result in new or increased significant noise impacts at nearby sensitive receptors.

- Mechanical Equipment. The Revised Project's additional 119 residential dwelling units would require additional roof-mounted HVAC units. Regulatory compliance with LAMC Section 112.02 would ultimately ensure that noises from these mechanical units do not increase ambient noise levels at neighboring properties by more than 5 dBA. Given this regulation and the relatively quiet operation of modern HVAC systems, it is unlikely that the Revised Project's HVAC systems would be capable of increasing off-site noise levels by a discernible degree. Many land uses in the vicinity of the Project also contain rooftop-mounted HVAC equipment, or noisy window-mounted units.

- Landscape Maintenance. The Revised Project would contain similar outdoor landscaped space as the Approved Project. Maintenance of this space would not be substantially different than the Approved Project, and temporary noises generated by landscaping equipment would similarly be considered less than significant.

- Commercial/Retail Land Uses. The Revised Project would contain marginally greater commercial/retail area than the Approved Project (+1,714 square feet). This additional space would not change the analysis and findings for these land uses presented in the EIR. The City's noise ordinance would provide a means to address nuisances related to commercial/retail noise. The Revised Project also would not modify its commercial and retail land uses in a manner that could lead to increased impacts, such as by proposing rooftop commercial areas or other new outdoor commercial spaces.

- Auto-Related Activities. The Revised Project would contain additional parking spaces consistent with its increase in residential units and commercial/retail area. However, similar to the Approved Project, proposed parking areas would be mostly subterranean, and any at- and above-grade parking levels would not be open-air. As a result, auto-related noises from within the parking garage would not be substantially audible at neighboring sensitive receptors, and the increase in parking spaces would not result in increased auto-related noise impacts at surrounding receptors. Additionally, despite its increase in residential units and commercial/retail area, the Revised Project is forecast to result in just six additional net new daily vehicle trips per day when compared to the Approved Project. AM and PM peak hour vehicle activity would be reduced. The differences in the trip generation is discussed in the transportation section below. Therefore, the Revised Project's on-site vehicle activity and related noise would be similar to the Approved Project.

- Residential Land Uses. As discussed, the Revised Project would include an additional 119 dwelling units. However, similar to the Approved Project, outdoor community residential spaces with the potential to generate exterior noises, such as the pool area, would be located near Sunset Boulevard and away from nearby sensitive receptors. The City's noise ordinance would provide a means to address any occasional acute nuisances caused by residents.

- Truck Deliveries. The Revised Project's modest increase in commercial/retail area would not lead to a substantial increase in truck deliveries, and any associated noise impacts would

not exceed the impacts disclosed in the EIR. A 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speed and fleet mix remain constant. The minimal addition of truck deliveries to local roadways would not nearly double the traffic volumes of those roads, nor would it augment their traffic to levels capable of producing 5.0 dBA increases. In addition, these trucks could likely already by delivering to other existing nearby commercial uses.

With regard to off-site operational noise impacts, the Revised Project is estimated to generate 2,568 net new daily trips, including 171 net new AM peak hour trips and 206 net new PM peak hour trips. This would result in an additional six net new daily trips, but a reduction of 15 net new AM peak hour trips and 20 net new PM peak hour trips. As shown on **Tables 4-13** through **4-16**, the Revised Project's traffic would not result in noticeable increases in noise levels, let alone new or increased significant impacts beyond those already identified in the previously adopted EIR.

Table 4-13
Existing + Project A.M. Peak Hour Traffic Noise Impact

Roadway Segment	Side of Roadway	Estimated dBA L_{eq} 1hr			
		Existing (2019)	With Project (2019)	Project Change	Significant Impact?
Harold Way, W of St. Andrews Pl.	N	61.3	61.3	< 0.1	No
	S	60.3	60.4	0.1	No
Western Ave. from Project to Carlton Way	E	70.6	70.6	< 0.1	No
	W	71.3	71.4	0.1	No
Harold Way, W of Western Ave.	N	57.9	58.2	0.3	No
	S	57.3	57.6	0.3	No
Source: NTEC, 2019.					

Table 4-14
Existing + Project P.M. Peak Hour Traffic Noise Impact

Roadway Segment	Side of Roadway	Estimated dBA L_{eq} 1hr			
		Existing (2019)	With Project (2019)	Project Change	Significant Impact?
Harold Way, W of St. Andrews Pl.	N	59.9	60.0	0.1	No
	S	59.1	59.3	0.2	No
Western Ave. from Project to Carlton Way	E	70.8	70.8	< 0.1	No
	W	70.8	70.9	0.1	No
Harold Way, W of Western Ave.	N	60.0	60.3	0.3	No
	S	59.5	59.9	0.4	No
Source: NTEC, 2019.					

Table 4-15
Future + Project A.M. Peak Hour Traffic Noise Impact

Roadway Segment	Side of Roadway	Estimated dBA L_{eq} 1hr				
		Existing (2019)	No Project (2024)	With Project (2024)	Total Change	Significant Impact?
Harold Way, W of St. Andrews Pl.	N	61.3	61.3	61.4	0.1	No
	S	60.4	60.4	60.5	0.1	No
Western Ave. from Project to Carlton Way	E	70.6	71.5	71.5	0.9	No
	W	71.3	72.1	72.1	0.8	No
Harold Way, W of Western Ave.	N	57.9	58.0	58.2	0.3	No
	S	57.3	57.3	57.7	0.4	No
Source: NTEC, 2019.						

Table 4-16
Future + Project P.M. Peak Hour Traffic Noise Impact

Roadway Segment	Side of Roadway	Estimated dBA L_{eq} 1hr				
		Existing (2019)	No Project (2024)	With Project (2024)	Total Change	Significant Impact?
Harold Way, W of St. Andrews Pl.	N	59.9	60.2	60.4	0.5	No
	S	59.1	59.5	59.6	0.5	No
Western Ave. from Project to Carlton Way	E	70.8	71.8	71.8	1.0	No
	W	70.8	71.8	71.9	1.1	No
Harold Way, W of Western Ave.	N	60.0	60.1	60.3	0.3	No
	S	59.5	59.5	59.9	0.4	No
Source: NTEC, 2019.						

The following analysis is provided to evaluate the construction noise impacts of the Revised Project in accordance with the latest guidance and methodologies. Based on guidance from the City of Los Angeles Department of Planning, the criteria identified by the Federal Transit Administration (FTA) in its 2018 Transit Noise and Vibration Impact Assessment manual should be used where applicable and relevant to assist in analyzing a project's groundborne vibration impacts as they pertain to Appendix G Threshold (b). Though not regulatory in nature, the FTA has established vibration impact criteria for buildings and other structures, as potential building and structural damages are generally the foremost concern when evaluating the impacts of construction-related vibrations. **Table 4-17** summarizes the FTA's vibration guidelines for building and structural damage.

Table 4-17
FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, 2018.	

As discussed earlier, the Revised Project would use the same mix of construction equipment as described in the EIR. Changes to the Revised Project's construction would involve the extension of certain construction phases and an additional day of work would per week, but daily construction activities would be similar. The Revised Project would not require equipment that generates greater groundborne vibration levels than the drilling/boring rigs previously analyzed in the EIR. Auger drilling/boring rigs can produce vibration levels of 0.089 inches per second PPV at a reference of 25 feet. Other construction vehicles and equipment would have lesser impacts, and the Revised Project would not require impact or vibratory pile driving.

Table 4-18 shows the Revised Project's estimated vibration impacts at nearby structures. As shown, the Revised Project would not expose any nearby structures to potentially damaging levels of groundborne vibration. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

Table 4-18
Building Damage Vibration Levels at Off-Site Structures – Unmitigated

Off-Site Structures	Distance to Project Site (feet)	Condition	Significance Criteria (in/sec PPV)	Impact (in/sec PPV)	Significant ?
5521 Harold Way Residences	70	I. Reinforced concrete, steel, or timber	0.5	0.019	No
Views@270 Apartments	95	I. Reinforced concrete, steel, or timber	0.5	0.012	No
Vinewood Community Correctional Center	20[A]	I. Reinforced concrete, steel, or timber	0.5	0.124	No
St. Andrews Place Bungalows	20[A]	I. Reinforced concrete, steel, or timber[B]	0.5	0.124	No
Starlight Apartments – 5532 Harold Way	20[A]	I. Reinforced concrete, steel, or timber	0.5	0.124	No
5533-5543 Sunset Boulevard – Commercial Building	10[A]	I. Reinforced concrete, steel, or timber	0.5	0.352	No

[A] Refinements to the construction plans indicate that auger drilling for the nearest footing structures would occur no less than 20 feet from nearby residential buildings and no less than 10 feet from the nearest commercial building.
[B] Despite the age of these residences, they contain no architectural, structural, or other elements that would be particularly sensitive to groundborne vibrations, and the Class I FTA rating is the most appropriate designation.
Source: NTEC, 2019. Reference vibration levels obtained from the FTA's 2006 Transit Noise and Vibration Impact Assessment manual.

With regard to operational vibration sources, the Revised Project includes the same mix of uses as the Approved Project and would not include significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. As discussed in the EIR, road vehicles rarely create levels of groundborne vibration perceptible to humans, and Project-related traffic would have little to no effect on roadside vibration receptors. The Revised Project would

not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.13.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to noise. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.13.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to noise impacts. No substantial changes in the environment related to noise have occurred since certification of the EIR, and no substantial new significant noise sources have been identified within the vicinity of the Revised Project that would result in new or more severe significant environmental impacts.

4.13.5 Mitigation Measures Addressing Impacts

The mitigation measures adopted by the Final EIR, and as modified as described above in **Table 4-11** for the Revised Project, are listed below:

H-1: The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

H-2: Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.

H-3: Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.

H-4: All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent noise-sensitive land uses.

H-5: Generators, compressors, and other noisy equipment shall be placed within acoustic enclosures or behind baffles or screens, especially when such equipment has line of

sight to nearby noise-sensitive receptors and/or are not located within the confines of the Revised Project's perimeter sound barriers.

H-6: Temporary sound barriers shall be erected along all northern Project boundaries to obstruct line of sight noise paths to sensitive receptors located along Harold Way. These sound barriers shall be constructed of materials capable of achieving a noise reduction of at least 15 dBA.

At all other Revised Project boundaries, temporary sound barriers no less than 8 feet in height shall be erected. These sound barriers shall be constructed of materials capable of achieving a noise reduction of at least 15 dBA.

Temporary sound barrier "penalty boxes" shall be erected for truck-mounted cranes, concrete pumping trucks, concrete mixing trucks, and other construction-related vehicles that may be permitted to temporary operate from adjacent on-street parking spaces or public right of way, outside the confines of the Project's perimeter sound barriers. The sound barriers forming the "penalty boxes" shall be constructed of materials capable of achieving a noise reduction of at least 10 dBA.

Alternatively, where existing masonry walls occur along the Project's property lines, and where these walls match or exceed the height specifications outlined above, these walls may be maintained throughout the Project's construction phases to function as sound barriers.

H-7: A haul route for exporting cut materials from the site shall access the Hollywood Freeway via Western Avenue, Hollywood Boulevard, Sunset Boulevard, or other major arterials. The route shall avoid traveling on residential streets, especially those passing through the neighborhood directly to the Project's north and west.

The Mitigation Measures noted above will be incorporated into the Revised Project in order to match or exceed the Final EIR's previously adopted Mitigation Measures and ensure compliance with required regulations.

4.13.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.14 Population and Housing

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
POPULATION AND HOUSING: Would the project:					
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than Significant	No	No	No	No
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact	No	No	No	No

4.14.1 Impact Determination in the EIR

Based on the 2015 persons-per-household rate for the City shown on Table IV.I-3 of the Draft EIR, the Project would add approximately 803 residents to the Project Site. As shown on Table IV.I-3, the Project would represent approximately 2.31 and 2.05 percent of the estimated population and housing growth (respectively) in the City between 2015 and 2020 and less than one-half of one percent of the estimated population and housing growth in the City between 2015 and 2035. Thus, the Project's residents and housing units would fall within the estimates and RHNA allocation, providing 1.21 percent of the number of needed dwelling units identified for the Hollywood Community Plan Area, while also being consistent with regional policies to reduce urban sprawl, efficiently utilize existing infrastructure, reduce regional congestion, and improve air quality through the reduction of vehicle miles traveled (VMT). Thus, the Project would not represent a substantial or significant growth as compared to projected growth. Therefore, Project impacts related to population and housing would be less than significant.

As no housing currently exists on the Project Site, the Project would not displace any existing housing or people and would not necessitate the construction of replacement housing elsewhere. No impacts would occur.

4.14.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The growth projections in SCAG RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from

the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG's planning area.[29] The Project Site is located in SCAG's City of Los Angeles Subregion.

Table 4-19 includes the 2019 (baseline) and 2024 (operation) population[30], households[31], and employment[32] values from SCAG's 2016-2040 RTP/SCS.

Table 4-19
Population, Households, and Employment in the City of Los Angeles

Year	Population	Households	Employment
2019	4,036,475	1,416,700	1,814,575
2024	4,172,886	1,481,842	1,898,986
Projected Growth	**+136,411**	**+65,142**	**+84,411**

Population, housing, and employment data calculated based on linear interpolation of 2019 and 2024 values.
Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.
Table: CAJA Environmental Services, June 2019.

According to the City of Los Angeles Department of City Planning, the most recent estimated household size for multi-family housing units in the City of Los Angeles area is 2.42 persons per unit.[33] Population generation is shown in **Table 4-20.** The Revised Project would generate approximately 997 residents.

Table 4-20
Revised Project Estimated Population Generation

Land Use	Quantity	Population Generation Rates	Total Population
Residential	412 units	2.42 person / DU	997

Note: DU = dwelling unit
The source for the 2.42 persons-per-household rate for the City is Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.
Table: CAJA Environmental Services, December 2019.

Employee generation is shown in **Table 4-21**. It is estimated that the Project would generate approximately 100 employees (in total; this number on site at a given time would be reduced per

29 http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf

30 The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012. Population between 2012 (3,845,500) and 2040 (4,609,400) is projected to grow by 763,900 over the 28-year period, or 27,282.14 per year average.

31 The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012. Households between 2012 (1,325,500) and 2040 (1,690,300) is projected to grow by 364,800 over the 28-year period, or 13,028.57 per year average.

32 The interpolated value is calculated using SCAG's 2012 and 2040 values to find the average increase between years and then applying that annual increase to 2012 for the baseline and buildout years. Employment between 2012 (1,696,400) and 2040 (2,169,100) is projected to grow by 472,700 over the 28-year period, or 16,882.14 per year average.

33 2017 American Community Survey 5-Year Average Estimate (2013-2017). The persons per household for multi-family units was calculated by looking at "units in structure" and "total population in occupied housing units by units in structure."

shifts and other operational needs). The removal of the existing retail uses would yield a net increase of 28 employees.

Table 4-21
Revised Project Estimated Employee Generation

Land Use	Size	Generation Rates	Total
Market	23,940	1 employee / 369 sf	65
Shopping Center	10,564 sf	1 employee / 369 sf	29
Office	1,190 sf	1 employee / 209 sf	6
Retail (to be removed)	26,457 sf	1 employee / 369 sf	(72)
		Net Project	**28**

Note: sf = square feet
Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018, Table 14.
Neighborhood Shopping Center land uses, which is 369 sf per employee.
Office land uses, which is 209 sf per employee.
Table: CAJA Environmental Services, June 2019.

As shown in **Table 4-22**, based on SCAG's 2016–2040 RTP/SCS, the population generated by the Project would represent approximately 0.73 percent of the projected growth in the City of Los Angeles between 2019 and 2024 (i.e., the Project's baseline and buildout years). Therefore, Project impacts related to population growth would be less than significant.

As shown in **Table 4-22**, based on SCAG's 2016–2040 RTP/SCS, the housing generated by the Project would represent approximately 0.63 percent of the projected growth in the City of Los Angeles between 2019 and 2024 (i.e., the Project's baseline and buildout years). Based on the above analysis, the Project would not cause housing growth to exceed projected/planned levels for the Project's buildout year. As such, development of the Project would not result in an adverse physical change in the environment. Impacts relating to housing growth would be less than significant.

As shown in **Table 4-22**, based on SCAG's 2016–2040 RTP/SCS, the employees generated by the Project would represent approximately 0.03 percent of the projected growth in the City of Los Angeles between 2019 and 2024 (i.e., the Project's baseline and buildout years). Therefore, Project-related employment generation would be within and, thus, consistent with SCAG's employment forecasts for the City of Los Angeles. Impacts relating to employees would be less than significant.

Table 4-22
Revised Project Percentage Share of Projected Growth

Factor	Project Impact	SCAG Projected Growth	% of Growth
Population	1,001	+136,411	0.73
Housing	412	+65142	0.63
Employment	28	+84,411	0.03

SCAG Projected Growth numbers from Table 4-19 of this section.
Table: CAJA Environmental Services, May 2020.

Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

No housing exists on the Project site. Therefore, the Project would not displace any existing housing or residents, necessitating the construction of replacement housing elsewhere.

Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.14.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to population and housing. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.14.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to population and housing impacts. No substantial changes in the environment related to population and housing have occurred since certification of the EIR that would result in new or more severe significant environmental impacts.

4.14.5 Mitigation Measures Addressing Impacts

Since the EIR determined the Project would have a less than significant impact on population and housing impacts, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.14.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.15 Public Services

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
PUBLIC SERVICES: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
(a) Fire protection?	Less than Significant	No	No	No	No
(b) Police protection?	Less than Significant	No	No	No	No
(c) Schools?	Less than Significant	No	No	No	No
(d) Parks?	Less than Significant	No	No	No	No
(e) Other public facilities?	Less than Significant with Mitigation	No	No	No	Yes

4.15.1 Impact Determination in the EIR

Impacts related to fire protection services, police protection services, schools, and parks would be less than significant. Since the Project would have a significant impact on library services, mitigation measure is required. With implementation of Mitigation Measure J-1, impacts on library services would be less than significant.

4.15.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would be at the same location and with the same land uses as the Approved Project. The Revised Project would generate more residents and employees than the Approved Project. However, population itself is not the only factor considered in whether there will be any new significant impacts. The other considerations noted in the Draft EIR, such as fire flow, response distance and time, and emergency access would be similar as for the Revised Project. These are characteristic of the fire and police facilitates and location and not dependent on the number of residents.

For fire and police service, Proposition 172 ensures that public safety services are provided. Section 35 of Article XIII of the California Constitution at Subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by voters in 1993 pursuant to Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with Proposition 172 to ensure that public safety services are provided.[34]

The obligation to provide adequate fire and police protection and emergency medical services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's and LAPD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, neither LAFD nor LAPD have identified that it will be constructing a new station in the area impacted by this Project either because of this Project or other projects in the service area.

For schools and parks, the increase in residential units and residents would be offset by additional property taxes, school fees and park fees. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law (Government Code Section 65996).

Pursuant to the California Government Code Section 65995[35] and California Education Code Section 17620[36], mandatory payment of the school fees established by LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, fully address and mitigate any potential direct and indirect impacts to schools as a result of the Project. Therefore, both Approved Project and Revised Project impacts to school services would be less than significant with compliance with regulatory requirements to pay school fees

34 City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847.

35 California Government Code Section 65995, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65995

36 California Education Code Section, 17620https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=17620

pursuant to the Government Code. Moreover, the Revised Project would be adequately served by area schools.

While Project residents would use the on-site open spaces and recreational facilities, it is reasonably foreseeable that Project residents would use nearby parks and recreation facilities. The Revised Project includes 45,338 square feet of open space, including community rooms, fitness, private decks, and a roof deck. This is an increase of 6,589 square feet as compared to the Approved Project to accommodate the increase in residential population on-site. The increased residential population would potentially increase the demand on existing parks and recreational facilities. However, with the provided on-site and open space and payment of applicable fees, the Project would be adequately served by area park and recreational facilities.

The Project would not directly necessitate the need for a new library facility. The LAPL has indicated that there are no current planned improvements to add capacity through expansion. The LAPL uses the most recent Census figures to determine if a branch should be constructed in a given area. As noted in the Draft EIR, the Project is served by six libraries in the vicinity. The Goldwyn-Hollywood is a regional branch (as a 19,000 square foot facility). It currently serves 78,944 persons and would be able to accommodate the Project's 1,001 residents. Employees do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours. It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations.[37,38,] Measure L has provided funds to restore adequate services to the existing library system. The Revised Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. The Revised Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. The increase in residential units and residents would be offset by additional property taxes. Therefore, the Revised Project would not directly result in the need for new or altered facilities, the construction of which would cause significant environmental impacts.

The Draft EIR analysis adequately addresses the changes in the Revised Project. No new analysis is needed. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.15.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to public

37 "To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use": http://www.nea.gov/research/toread.pdf

38 "How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation: http://old.diglib.org/use/whitepaper.htm

services. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.15.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to public services impacts. No substantial changes in the environment related to public services have occurred since certification of the EIR, and no substantial new significant noise sources have been identified within the vicinity of the Revised Project that would result in new or more severe significant environmental impacts.

4.15.5 Mitigation Measures Addressing Impacts

The mitigation measure adopted by the Final EIR is listed below:

J-1: Prior to issuance of a Certificate of Occupancy, the Project Applicant shall pay the LAPL $200 per dwelling unit.

The Revised Project would also comply with this mitigation measure, and the Revised Project will comply with all applicable regulatory requirements.

4.15.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.16 Recreation

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
RECREATION: Would the project:					
(a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less Than Significant	No	No	No	No
(b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less Than Significant	No	No	No	No

4.16.1 Impact Determination in the EIR

The increased residential population would potentially increase the demand on existing parks and recreational facilities. However, in accordance with the City's applicable codes for mitigating impacts to parks, the Project Applicant would be required to pay a Parkland Fee to the City to mitigate for the Project's demand for parks and recreational facilities. The Project would exceed the City's open space requirements. Through compliance with LAMC requirements, Project impacts related to parks and recreational services would be less than significant.

4.16.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The increased residential population due to the Revised Project would potentially increase the demand on existing parks and recreational facilities. However, in accordance with the City's applicable codes for mitigating impacts to parks, and similar to the Approved Project, the Project Applicant would be required to pay Parkland Fee to the City to mitigate for the Revised Project's demand for parks and recreational facilities. The Revised Project is also required to provide 43,025 square feet of on-site open space and would provide 45,338 square feet of open space, which would exceed the City's open space requirements. Through compliance with LAMC requirements, the Revised Project impacts related to parks and recreational services would be less than significant. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.16.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to recreation. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.16.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to recreation not discussed in the EIR, significant effects related to recreation previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.16.5 Mitigation Measures Addressing Impacts

Since the EIR determined the Project would have no impact on recreation, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.16.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.17 Transportation

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
TRANSPORTATION / TRAFFIC: Would the project:					
(a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Significant and Unavoidable	No	No	No	Yes
(b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)? [39]	Not Addressed	No	No	No	No
(c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No Impact	No	No	No	No
(d) Result in inadequate emergency access?	Less Than Significant	No	No	No	No

This section is based on the following items, which are included as **Appendix G** to this Addendum:

G-1 Transportation Impact Study, Overland Traffic Consultants, June 13, 2019.

G-2 LADOT Letter, August 6, 2019.

G-3 CEQA Transportation Assessment, Overland Traffic Consultants, April 16, 2020.

G-4 Supplemental VMT Analysis and Freeway Safety Evaluation, Overland Traffic Consultants, May 6, 2020.

G-5 VMT Comparative Analysis, Overland Traffic Consultants, May 7, 2020.

4.17.1 Impact Determination in the EIR

In regards to vehicle circulation and roadway facilities, as shown in Table IV.K-6 of the Draft EIR, the Project would generate a net increase of 2,562 daily trips with 186 morning peak-hour trips and 226 afternoon peak-hour trips. As shown in Table IV.K-7 of the Draft EIR, the Project would not result in any significant impacts at any of the study intersections during the Existing Plus Project LOS Conditions.

39 The City adopted a VMT methodology on July 30, 2019. During this transition, projects that already have a signed memorandum of understanding (MOU) with LADOT and have filed an application with DCP may continue analyzing transportation impacts with level of service (LOS), as long as the project will be adopted and through any appeal period prior to the State deadline of July 1, 2020.

Based on LADOT's significance thresholds, in the future cumulative scenario, the Project would result in potentially significant impacts at two of the study intersections (Western Avenue at its intersections with Hollywood Boulevard and Sunset Boulevard). Since the Project would result in potentially significant intersection LOS impacts under the future cumulative traffic condition, Mitigation Measure K-1 (roadway improvements including re-striping, CCTV cameras, and signal system upgrades at Hollywood/Western and Sunset/Western) is required. As shown on Table IV.K-16, with implementation of Mitigation Measure K-1, Project impacts under the future cumulative condition at the Hollywood Boulevard/Western Avenue Intersection and the Sunset Boulevard/Western Avenue Intersection would be reduced to less than significant.

Using the daily trip generation calculations along with the anticipated Project traffic distributions, the amount of daily Project-related trips along Harold Way was estimated. These Project traffic volumes and existing and future cumulative street traffic volumes are shown on Table IV.K-9 of the Draft EIR. As shown, Project traffic volumes on Harold Way east of Wilton Place would exceed the 8.0 percent significance threshold. Therefore, Project impacts related to neighborhood intrusion would be significant. Since the Project would result in a significant impact related to neighborhood intrusion, Mitigation Measures K-2 (Transportation Demand Management program to reduce the Project's traffic generation) and K-3 (identify traffic calming measures and to design a neighborhood-calming program on Harold Way) are required. Although Mitigation Measures K-2 and K-3 could minimize Project impacts on Harold Way, these measures would not reduce the Project's impact to less than significant. No other feasible mitigation measures to further reduce the Project's impact on Harold Way were known at the time. Therefore, the Project's neighborhood intrusion impacts would remain significant and unavoidable.

In regards to transit, bicycle, and pedestrian facilities, the Approved Project would not conflict with plans, policies, and programs related to these circulation systems. The Project would be required to include bicycle parking in accordance with the City's bicycle parking requirements and would not conflict with any plans for bicycle infrastructure. The Project would not impact any of the bus routes or turnouts in the Project area. The Approved Project would widen the west side of Western Avenue by seven feet from north of Sunset Boulevard to Harold Way to allow for the installation of a southbound right-turn lane on Western Avenue. This would not affect bus access to the area which would still have stops at the intersection of Sunset and Western. Bicycles would still be able to utilize these lanes for travel. Adequate sidewalks and crosswalks would be improved around the Project Site and at the signal-controlled intersection, and the Project would be designed with pedestrian-oriented features such as transparent ground-floor commercial uses. The Project would not conflict with these facilities.

The City adopted a VMT methodology on July 30, 2019. The Final EIR was released on January 26, 2018. Therefore, VMT was not required at that time and is not discussed in the Approved EIR.

Regarding design hazards and emergency access, all ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City of Los Angeles Department of Building and Safety (LADBS), Department of Transportation (LADOT), and LAFD

standards and requirements for design and construction. The Project would not create any geometric design hazards and would not result in inadequate emergency access. No impacts would occur as a result of the Project.

Nonetheless, Mitigation Measures K-4, K-5, and K-6 addressing site access were added as part of the Final EIR, for purposes of consistency with the requirements identified by LADOT in their updated traffic study approval letter submitted as part of the Final EIR. The mitigation measures would require a construction work site traffic control plan, operational standards for delivery loading and unloading, and a requirement for left-turn channelization ion northbound Western Avenue at Harold Way and a new eastbound left-turn lane on Harold Way at Western Avenue to facilitate access to the driveways on Harold Way. Although impacts regarding design hazards and emergency access were determined to be not significant, these requirements would further reduce any potential impacts.

4.17.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Similar to the Approved Project, the Revised Project would not conflict with a program, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Circulation impacts were analyzed based on level of service and intersection impacts, neighborhood intrusion impacts, and consistency with transit, bicycle, and pedestrian facilities. Previous mitigation measures from the LADOT's August 6, 2019 approval would continue to be required for these circulation impacts, and would be updated to reflect existing improvements that have been since implemented near the Project Site. As such, no new significant circulation impacts would occur and previously identified impacts would not be substantially more severe.

In addition, a VMT analysis was performed, and measures to reduce VMT would be added to the Transportation Demand Management (TDM) program and would be less than significant with mitigation.

The Revised Project has received approval for site vehicular access and driveway location as it complies with the LADOT driveway access and location policies, and similar to the Approved Project, would not substantially increase hazards or result in result in inadequate emergency access.

Therefore, as further detailed below, with implementation of transportation requirements and mitigations, the Revised Project would not involve new significant transportation impacts or substantially more severe impacts.

Circulation System

As part of the updated traffic analysis, an updated list of Related Projects was obtained from the Los Angeles Department of City Planning and Los Angeles Department of Transportation. The list expanded from 127 to 130 Related Projects, including the nearby mixed use (apartment, market, restaurant) project at 5420 Sunset Boulevard. The updated Related Projects were considered in the new analysis.

Traffic counts were taken in April 2019. A comparison of the 2017 to 2019 traffic counts has been made in **Table 4-23**. Peak hour traffic volumes at the 15 study intersections were added for the AM and PM peak hours. The results show an approximately 7 percent reduction in total volume in 2019.

Table 4-23
Traffic Counts Comparison

	AM	PM
2017	46,148	49,806
2019	42,983	46,123
Vol. Difference	-3,165	-3,683
% Reduction	-6.9%	-7.4%
Source: Overland Traffic Consultants, Inc.		

As shown in Table 2 of the Transportation Impact Study (included as Appendix G-1 to this Addendum), the Revised Project is estimated to add 2,568 net daily trips with 171 net morning peak hour trips and 206 net afternoon peak hour trips, as compared to the Approved Project's 2,562 net daily trips with 186 morning peak hour and 226 afternoon peak hour trips. This is an increase of 6 daily trips (0%), decrease of 16 morning trips (-9%), and decrease of 20 afternoon trips (-9%).

As required by the City of Los Angeles Department of Transportation (LADOT), traffic generation estimates for the Revised Project utilized the newly expanded 10th Edition Institute of Transportation Engineers (ITE) traffic generation manual. The Approved Project utilized the 9th Edition ITE traffic generation manual. Differences between the 9th Edition and 10th Edition traffic rates include refinements for projects located in dense neighborhoods and served by transit. In addition, the Revised Project includes the LADOT adopted reduced traffic generation rates for affordable housing, which were not utilized by the Approved Project, as they were adopted by LADOT in their December 2016 Guidelines, after release of the Draft EIR. There are several reasons for the slightly lower trip generation total for the Revised Project as compared to the Approved Project, despite the fact that the Revised Project includes a higher apartment unit count and additional commercial floor area:

- As compared to the previous 9th Edition, the ITE 10th edition has a lower rate for apartments[40], shopping center[41], and office[42], but higher rate for grocery store [43]. The lower shopping center rate reduced the amount of trip credits taken for the removal of the existing retail uses on the Project Site. This therefore, slightly increased the net project traffic in the 2019 study;

40 Apartment: 9th, 6.65 daily compared to 10th, 5.44.
41 Shopping Center: 9th, 42.70 daily compared to 10th, 37.75.
42 Office: 9th, 11.03 daily compared to 10th, 9.74.
43 Grocery: 9th, 102.24 daily compared to 10th, 106.78.

- The Revised Project no longer includes restaurant uses, which have been replaced with shopping center uses, which consequently reduced commercial traffic generation;

- The 2019 traffic study included reduced trip rates for its 61 affordable units, which were not available to be utilized in the 2017 study.[44]

Based on the updated trip counts for the Revised Project, the traffic study identified the Existing Traffic Conditions and analyzed the Revised Project's impact when added to Existing Traffic Conditions. None of the study intersection's impact values for the "Existing + Project" scenario equals or exceeds the significant impact criteria.

Intersection Impacts

The traffic study also estimated Future Traffic Conditions (2024), based on the Related Projects and an ambient growth rate, and analyzed the Revised Project's impacts. In the future cumulative scenario[45], the same two study intersections (Western Avenue at its intersections with Hollywood Boulevard and Sunset Boulevard) are impacted by the Revised Project traffic volume as the Approved Project, using the significant impact criteria established by LADOT. See **Table 4-24** for a comparison of the Approved Project to the Revised Project's intersection impacts.

Table 4-24
Future Without and With Project Conditions

No.	Intersection	Peak Hour	Approved Project			Revised Project		
			Future Without	Future With	Impact	Future Without	Future With	Impact
1.	Hollywood Boulevard & 101 Freeway SB Off Ramp	AM	0.809	0.811	No	0.627	0.624	No
		PM	0.787	0.787	No	0.731	0.727	No
2.	Hollywood Boulevard & 101 Freeway NB Off Ramp	AM	0.866	0.873	No	1.080	1.073	No
		PM	0.825	0.830	No	1.021	1.016	No
3.	Hollywood Boulevard & Wilton Avenue	AM	0.924	0.925	No	0.817	0.809	No
		PM	0.957	0.962	No	1.004	0.999	No
4.	Hollywood Boulevard & Western Avenue	AM	**1.035**	**1.053**	**YES**	0.839	0.821	No
		PM	**0.955**	**0.981**	**YES**	**1.031**	**1.009**	**YES**
5.	Sunset Boulevard & Van Ness Avenue	AM	0.870	0.876	No	0.859	0.856	No
		PM	0.973	0.978	No	0.883	0.874	No
6.	Sunset Boulevard & Wilton Place	AM	0.734	0.745	No	0.728	0.718	No
		PM	0.787	0.798	No	0.777	0.767	No
7.	Sunset Boulevard & St. Andrews Place east/ driveway	AM	0.525	0.534	No	0.619	0.609	No
		PM	0.593	0.593	No	0.535	0.535	No
8.	Sunset Boulevard & Western Avenue	**AM**	**0.969**	**0.992**	**YES**	**1.024**	**1.004**	**YES**
		PM	**1.003**	**1.037**	**YES**	**1.116**	**1.091**	**YES**
9.	Sunset Boulevard &	AM	0.479	0.486	No	0.446	0.439	No

44 Affordable rates per LADOT Transportation Impact Study guidelines, December 2016, Table 5 page 14. Apartments: 5.44 daily compared to Affordable Apartments: 4.08.

45 Related Projects from 2019 + Project + ambient growth to 2024.

	Serrano Avenue	PM	0.511	0.514	No	0.537	0.534	No
10.	Sunset Boulevard &	AM	0.609	0.616	No	0.600	0.593	No
	Normandie Avenue	PM	0.716	0.719	No	0.651	0.648	No
11.	Western Avenue &	AM	0.688	0.693	No	0.807	0.800	No
	Fountain Avenue	PM	0.829	0.837	No	0.835	0.827	No
12.	Western Avenue &	AM	1.113	1.117	No	0.965	0.960	No
	Santa Monica Boulevard	PM	1.179	1.184	No	1.076	1.072	No
BOLD = Indicates a significant impact Source: Overland Traffic Consultants, Inc., 2015 and 2019.								

Similar to the Approved Project, for the two intersection impacts, mitigation measure **MM-Trans-1** would include physical roadway improvements including dedications to allow for installation of a right-turn lane, CCTV cameras, system detector loops, and signal system upgrades, as detailed below. The mitigation measure was updated to remove the requirement to restripe a portion of Western Avenue, which has since been implemented, and replaced the requirement with the installation of CCTV cameras. Additional detail regarding changes to the Mitigation Measure is available in **Table 4-28**. Similar to the Approved Project, the significant intersection traffic impacts under the Revised Project will be reduced to a level of less than significant, as shown in **Table 4-25**, below.

Similar to the Approved Project, in consideration of the City's goals to reduce greenhouse gas emissions, reduce project-related trips, and promote other travel modes, a Transportation Demand Management (TDM) program, **MM-Trans-2** would also be implemented as part of the Revised Project.[46]

Table 4-25
Future Conditions After Mitigation

			Approved Project			Revised Project		
No.	**Intersection**	**Peak Hour**	**Without MM**	**With MM**	**Impact**	**Without MM**	**With MM**	**Impact**
4.	Hollywood Boulevard &	AM	1.035	0.971	No	0.821	0.825	No
	Western Avenue	PM	0.955	0.917	No	1.009	1.004	No
8.	Sunset Boulevard &	AM	0.969	0.885	No	1.004	0.889	No
	Western Avenue	PM	1.003	0.970	No	1.091	1.025	No
BOLD = Indicates a significant impact MM – mitigation measures Source: Overland Traffic Consultants, Inc., 2015 and 2019.								

Neighborhood Intrusion Impacts

In regards to neighborhood instruction impacts on Harold Way, the 2019 Traffic Study utilized the daily trip generation calculations along with the anticipated Revised Project traffic distributions. A local residential street shall be deemed significantly impacted based on an

46 LADOT Letter, August 6, 2019.

increase in the estimated average daily traffic (ADT) volume. For a street with a final (with Project) ADT of 3,000 or more trips, the threshold is a Project-related increase of 8% or more. The amount of daily commercial trips using Harold Way was estimated to be 545 daily trips for the Revised Project, compared with 1,090 daily trips for the Approved Project. Harold Way east of Wilton Place is expected to exceed the 8 percent significant impact threshold for traffic generated by the commercial component of the mixed–use project. Specifically, the Revised Project's commercial uses would generate a 16.8% increase in daily traffic trips along Harold Way as compared to existing traffic conditions without the Project and a 16.1% increase in daily traffic as compared to future conditions without the Revised Project. As a comparison, the Approved Project would have resulted in a 22.2% increase in daily traffic as compared to existing conditions and a 21.7% increase for future conditions. Thus, while both the Approved Project and Revised Project would exceed the 8% threshold and result in a significant impact, the Revised Project has a lower severity of impact because its percentage increase in daily traffic due to the Revised Project is less as compared to the Approved Project based on LADOT's clarified methodology for neighborhood impacts.

The updated neighborhood impact analysis does not include residential traffic in the 2019 traffic study because the neighborhood street impact analysis follows the updated LADOT Transportation Impact Study Guidelines for evaluating an impact as a percentage of future daily traffic volumes. Furthermore, LADOT has issued a clarification for the neighborhood traffic intrusion analysis in a memo dated August 7, 2018, which states only cut-thru traffic generated by a project's commercial component be included as part of the neighborhood analysis. Therefore, residential traffic is no longer included in the neighborhood traffic intrusion analysis. The prior version of the neighborhood impact analysis conducted in the 2017 traffic study included residential traffic because this was prior to LADOT's clarification on which type of traffic is to be included for the neighborhood analysis.[47]

It is therefore recommended that the Revised Project implement a similar neighborhood calming program as the Approved Project to evaluate measures that would mitigate the neighborhood traffic impacts, such as installing speed humps or other traffic calming measures along Harold Way between Western Avenue and Wilton Place, subject to the approval procedures of LADOT and in consultation with the neighborhood. This is included as Mitigation Measure **MM-Trans-3** below. However, this mitigation would not reduce the impact to a level that is less than significant. No other feasible mitigation measures to further reduce the Project's impact on Harold Way are known at this time. Therefore, similar to the Approved Project, the Revised Project's neighborhood intrusion impacts would remain significant and unavoidable.

Transit, Bicycle, and Pedestrian Facilities

In regards to transit, bicycle, and pedestrian facilities, the Revised Project would similarly not conflict with plans, policies, and programs related to these circulation systems. Similar to the Approved Project, the Revised Project would be required to include bicycle parking in

47 It should also be noted that the morning and afternoon traffic trips for the Revised Project would be less than Approved Project, as noted on page 102, above.

accordance with the City's bicycle parking requirements. The Project site is well served by transit, and the Revised Project would support regional transit plans by locating a mixed-use development with increased density in proximity to transit. The Revised Project would not impact any of the bus routes or turnouts in the Project area. The Revised Project would dedicate two feet and widen the west side of Western Avenue by seven feet from north of Sunset Boulevard to Harold Way to allow for the installation of a southbound right-turn lane on Western Avenue. This would not affect bus access to the area which would still have stops at the intersection of Sunset and Western. Bicycles would still be able to utilize these lanes for travel. Adequate sidewalks and crosswalks would be improved around the Project Site and at the signal-controlled intersection, and the Project would be designed with pedestrian-oriented features such as transparent ground-floor commercial uses. The Revised Project would not conflict with these facilities and similar to the Approved Project, impacts would be less than significant.

VMT Analysis

The purpose of this section is to document transportation impacts associated with the Revised Project using LADOT's Transportation Assessment Guidelines (TAG), updated in September 2019, including a calculation of the project's VMT metric. While VMT impacts were not analyzed for the Approved Project, as the Approved Project's Traffic Study was completed prior to the new TAG guidance, they are estimated here for comparison purposes between the Approved and Revised Projects.

LADOT has identified thresholds for significant VMT impacts for each of the seven Area Planning Commission (APC) sub-areas. The project's VMT are compared against the City's threshold goals for household VMT per capita and work VMT per employee to evaluate the significance of the VMT increases. A development project will have a potential impact if the development project would generate VMT exceeding 15% below the existing average VMT for the Area Planning Commission (APC) area in which the project is located. The Project is in the Central APC sub-area which limits daily household VMT per capita to a threshold of 6.0 and a daily work VMT per employee threshold of 7.6 (15% below the existing VMT for the Central APC). It is important to note that these VMT thresholds are the lowest in Los Angeles.

As shown in **Table 4-26**, prior to the implementation of any TDM strategies, the Revised Project would result in a 7.0 household VMT per capita and a 7.1 work VMT per employee, meaning a significant household VMT impact prior to the implementation of TDM strategies, and a less than significant work VMT impact prior to the implementation of TDM strategies.

The following TDM strategies and assumptions were utilized in the calculation of VMT as either regulatory compliance or mitigation measures:

- PARKING STRATEGY – Reduce Parking Supply – The VMT application and effectiveness of this strategy is based on research and methodology documented in the 2010 CAPCOA Strategy PDT-1. This strategy changes the on-site parking supply to provide less than the amount of vehicle parking required by direct application of the LAMC without consideration

of parking reduction mechanisms permitted in the code. Permitted reductions in parking supply could utilize parking reduction mechanisms such as TOC, Density Bonus, Bike Parking ordinance, or locating in an Enterprise Zone or Specific Plan area. The Revised Project parking supply is less than the direct application of an unadjusted code parking calculation due to the SNAP parking standards while continuing to satisfy the project's peak parking demand. The reduced parking supply is already part of the Project as shown on the plans.

- PARKING STRATEGY - Unbundle Parking – This strategy unbundles the parking costs from the residential rental costs, requiring those who wish to secure parking spaces to do so at an additional cost from the apartment rental cost. The strategy assumes the parking cost is set by the VMT calculator to be a minimum of $135 per month and paid by the vehicle owners/drivers. Unbundled parking and monthly fees would be part of the leasing and operation plans for the Project and would be added as a new feature of the TDM program, by modifying **MM-Trans-2**.

- EDUCATION AND ENCOURAGEMENT – Promotions and Marketing – This strategy involves the use of marketing and promotional tools to educate and inform travelers about site-specific transportation options and the effects of their travel choices. This strategy includes passive educational and promotional materials, such as posters, info boards, or a website with information that a traveler could choose to read at their own leisure. This strategy is already included as part of **MM-Trans-2**.

- BICYCLE INFRASTRUCTURE – Implement / Improve on-street Bicycle Facility – This strategy involves implementing or providing funding for improvements to corridors and crossings for bike networks identified within the City's Mobility Plan 2035 within a one-half mile buffer area of the project boundary, to support safe and comfortable bicycle travel. The Project would provide a one-time fixed fee of $50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements within the Hollywood area. This funding is already part of **MM-Trans-2**.

- BICYCLE INFRASTRUCTURE – Include Bike Parking per LAMC – This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project (LAMC Section 12.21.A16(d)(2)).

- BICYCLE INFRASTRUCTURE – Include Secure Bike Parking and Showers – This strategy involves implementation of additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel by providing amenities at destinations. This is also a feature already required by the LAMC (LAMC Section 91.6307).

Implementing the VMT strategies outlined above shows that with mitigation, the Revised Project would have a work VMT per employee of 7.1 (under the threshold of 7.6) and a daily household VMT per capita value of 5.8 (at the threshold value of 6.0). See **Table 4-26**. With these

measures, the Revised Project would be consistent with the new CEQA Guidelines Section 15064.3 subdivision (b) and would result in less than significant impacts with mitigation.

Table 4-26
Revised Project VMT

	Without TDM Strategies		With TDM Strategies	
	Approved Project	Revised Project	Approved Project	Revised Project
Daily Vehicle Trips	3,017	3,334	2,866	3,129
Daily VMT	19,165	20,993	18,258	19,751
Household VMT	7.2	7.0	6.0	5.8
Impact Threshold	6.0	6.0	6.0	6.0
Significant Household VMT Impact	Yes	Yes	No	No
Work VMT	7.4	7.1	7.4	7.1
Impact Threshold	7.6	7.6	7.6	7.6
Significant Work VMT Impact	No	No	No	No
Source: Overland Traffic Consultants, Inc., 2020.				

Table 4-26 above, also shows a comparison of the VMT reports for the Approved Project and the Revised Project. Prior to the implementation of TDM mitigation measures, the Approved Project would result in a 7.2 household VMT per capita and a 7.4 work VMT per employee, meaning a significant household VMT impact prior to the implementation of mitigation, and a less than significant work VMT impact prior to the implementation of mitigation. After the implementation of TDM mitigation measures, impacts to both household and work VMT would be less than significant.

Both projects would generate project VMT below or at the Central APC VMT thresholds for work per employee and household per capita. No Significant VMT impacts are associated with either project after the implementation of the recommended TDM programs.

Both projects provide the same TDM strategies to reduce project VMT but the VMT differs because of the mixed-use methodology within the VMT calculator tool, which factors the project location and density within a transit priority area. Briefly, the mixed-use model accounts for the interaction of land uses within a mixed-use development to calculate trip length and trip mode. The greater the development density and concentration of dwellings and commercial space, the greater the likelihood that the interacting land uses will be near enough together to encourage walking or short-distance internal driving. In addition, sites with a better jobs/housing balance typically result in a larger proportion of commute trips that remain internal or within the APC. In summary, the VMT model and analysis shows that a project with a higher residential density (the Revised Project) will result in a lower VMT per capita for the mixed-use development than a lower density project (the Approved Project). Therefore, the Revised Project would result in lesser impact in terms of VMT than the Approved Project.

The previous mitigation measures (K-1 through K-6) would still would be implemented, with some revisions in their text. See **Table 4-27** for the revisions to the previously adopted Mitigation Measures as compared to the currently proposed Mitigation Measures:

Table 4-27
Comparison of Final EIR Mitigation Measures and Revised Project Mitigation Measures

Final EIR	Revised Project	Notes
K-1: Prior to the issuance of a Certificate of Occupancy, the Project Applicant shall implement the following roadway improvements: <u>Hollywood Boulevard/Western Avenue Intersection</u> a. Restripe Western Avenue to increase the southbound curb lane to 20 feet in width to facilitate the southbound right-turning traffic on Western Avenue at Hollywood Boulevard (i.e., functional right-turn lane). b. Upgrade the traffic signal controller to a Type 2070 controller at the intersection of Western Avenue and Russell Avenue. c. Install additional system detector loops along both approaches of Hollywood Boulevard and Harvard Boulevard. <u>Sunset Boulevard/Western Avenue Intersection</u> a. Widen the west side of Western Avenue north of Sunset Boulevard by seven (7) feet from north of Sunset Boulevard to Harold Way to allow for the installation of a southbound right-turn lane on Western Avenue. The ultimate design of this improvement shall maintain a minimum sidewalk/parkway width of 15-feet along the west side of Western Avenue north of Sunset Boulevard, and shall provide one left-turn lane, two through lanes, and one right-turn lane in the southbound direction. b. Install a CCTV camera and the necessary infrastructure (including fiber optic and interconnect) at	**MM-Trans-1 Physical Improvements** Prior to the issuance of a Certificate of Occupancy, the Project Applicant shall implement the following roadway improvements: <u>Hollywood Boulevard and Western Avenue</u> a. Install a CCTV camera and the necessary infrastructure (including fiber optic and interconnect) at Western Avenue and Hollywood Boulevard; b. Upgrade the traffic signal controller to a Type 2070 controller at the intersection of Western Avenue and Russell Avenue; and c. Install additional system detector loops along both approaches of Hollywood Boulevard and Harvard Boulevard. <u>Sunset Boulevard and Western Avenue</u> a. Dedicate two feet and widen the west side of Western Avenue by seven feet from north of Sunset Boulevard to Harold Way to allow for the installation of a southbound right-turn lane on Western Avenue. The ultimate design of this improvement should maintain a minimum sidewalk/parkway width of 15 feet along the west side of Western Avenue north of Sunset Boulevard, and should provide one left-turn lane, two through lanes, and one right-turn lane in the southbound direction; and b. Install a CCTV camera and the necessary infrastructure (including fiber optic and interconnect) at Sunset Boulevard and Western Avenue. These signal upgrades should be implemented either by the applicant through the B-permit process of the Bureau of Engineering (BOE), or through payment to DOT to fund the cost of the	The Mitigation Measure text has been revised with updated mitigation language listed in LADOT's Letter (August 6, 2019). The mitigation measures text has primarily changed due to changes in the existing setting (other developments in the area have implemented improvements for restriping of Western Ave near Hollywood Boulevard). Restriping was no longer necessary as it was assigned to another developer and included the restriping on Western Avenue at Hollywood Boulevard by the other developer in the existing and future baseline conditions which improves the intersection overall traffic conditions. As a replacement, LADOT required a CCTV camera and necessary infrastructure to be added instead. In addition, language regarding the coordination of mitigation measures with the adjacent Target project at 5520 Sunset Boulevard, B-Permit implementation procedures, process for mitigation substitution, and the applicant's responsibility of costs of bus shelter relocation was updated based on LADOT's updated standard language in their August 6, 2019 letter. However, this updated language did not materially change these

Sunset Boulevard and Western Avenue. These signal upgrades should be implemented either by the Applicant through the B-permit process of the Bureau of Engineering (BOE), or through payment to LADOT to fund the cost of the upgrades. If LADOT selects the payment option, then the Applicant would be required to pay LADOT the cost to design and construct the upgrades. If the upgrades are implemented by the applicant through the B-Permit process, then these traffic signal improvements shall be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy in accordance with the Project's traffic mitigation phasing plan. Temporary certificates of occupancy may be granted in the event of any delay through no fault of the Applicant, provided that, in each case, the Applicant has demonstrated reasonable efforts and due diligence to the satisfaction of LADOT. Both intersection improvements require coordination with the Target project located at the southwest corner of Sunset Boulevard and Western Avenue. At the Western Avenue/Hollywood Boulevard intersection, the Target project is required to do the same improvements identified in Mitigation Measure K-1, which would mitigate significant traffic impact identified for both the Project and the Target project. At the Western Avenue/Sunset Boulevard intersection, the Target project is required to widen Western Avenue by five (5) feet for a distance of approximately 160 feet north of the intersection. However, a two (2) foot dedication is required of the SunWest Project that would allow a seven (7) foot widening to satisfy the City's street standard for Western Avenue. If both projects are	upgrades. If DOT selects the payment option, then the applicant would be required to pay DOT the cost to design and construct the upgrades. If the upgrades are implemented by the applicant through the B- Permit process, then these traffic signal improvements must be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy in accordance with the project's traffic mitigation phasing plan. Temporary certificates of occupancy may be granted in the event of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of DOT. For all of the proposed intersection improvements, the final determination on the feasibility of street widening shall be made by BOE. All proposed street improvements and associated traffic signal work within the City of Los Angeles must be guaranteed through BOE's B-Permit process, prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator, at (213) 972-8687, to arrange a pre-design meeting to finalize the proposed design. Costs related to any relocation of bus zones and shelters and to modifying or upgrading traffic signal equipment that are necessary to implement the proposed mitigations shall be incurred by the applicant. In the event the originally proposed mitigation measures become infeasible, substitute mitigation measures of an equivalent cost may be provided, subject to approval by DOT, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the project's significant impact.	procedures and requirements.

constructed then the preferred mitigation at the Western Avenue/Sunset Boulevard intersection is to construct a third southbound through lane in lieu of a right-turn lane. A fair-share mitigation-sharing program for both intersections would be necessary if both projects go forward. If the Target project is not constructed, then implementation of Mitigation Measure K-1 listed shall be the responsibility of the Project Applicant, only. Costs related to any relocation of bus zones and shelters, and to modifying or upgrading traffic signal equipment and that are necessary to implement the proposed mitigation shall be incurred by the Applicant. In the event the originally proposed mitigation measures become infeasible, substitute mitigation measures of an equivalent cost may be provided subject to approval by LA DOT, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the Project's significant impact.	Construction of the Target project at 5520 West Sunset Boulevard on the southwest corner of Sunset Boulevard and Western Avenue has not yet been completed. The mitigation measures described above for the intersection of Sunset Boulevard and Western Avenue have been assigned to the Target project; however, consistent with DOT policy, the cost of mitigation measures can be shared between two developments provided that the improvement can mitigate the combined impact of the projects. At Western Avenue and Sunset Boulevard, Target is required to widen Western Avenue by five feet for a distance of approximately 160 feet north of the intersection. However, a two-foot dedication is required of the SunWest project which allows a seven-foot widening to satisfy the City street standard for Western Avenue. If both projects are constructed then the preferred mitigation at Western Avenue and Sunset Boulevard is to construct a third through lane southbound in lieu of a right-turn only lane ultimately providing one left-turn lane, two through lanes, and one shared through/right-turn lane in the southbound direction. A fair share mitigation sharing program for this intersection will be necessary if both projects move forward. If Target is not constructed then the mitigation measures listed above would be standalone mitigation.	
K-2: Prior to issuance of the first Building Permit, the Project Applicant shall prepare a Transportation Demand Management (TDM) program to the satisfaction of LADOT to reduce the Project's traffic generation. A final TDM program shall be submitted to LADOT for approval prior to issuance of a Certificate of Occupancy. Preliminarily, the traffic study prepared for the Project includes the following TDM strategies: • Provide a Transportation Management Office (TMO) with a TDM coordinator.	**MM-Trans-2 Transportation Demand Management (TDM) Plan** A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The preliminary plan will include, at minimum, measures consistent with the City's Trip Reduction Ordinance. The following measures were included in the traffic study as a startup TDM program:	The Mitigation Measure text has been revised to the updated language from LADOT's Letter (August 6, 2019). No substantive changes occurred to the content or features of the TDMs. However, based on the new VMT analysis for the Revised Project, one new TDM measure has been added to require unbundled residential parking and a the implementation of a monthly parking fee. VMT was

• Distribute Ridesharing and Transit information. • Market and promote ridesharing with ridesharing events. • Maintain on-site kiosks (as needed) located in a centralized area for viewing transit options. • Conduct carpool matching and provide preferential parking for all ridesharing vehicles. • Pedestrian friendly environment Project design. • Convenient and secure parking facilities and services for bicycle riders. • Guaranteed ride home program for employees. • Provide transit subsidies, such as pre-paid/discounted transit passes or a reduction in parking fees to transit and ridesharing participants. • Space on-site for future bicycle hub (requires coordination with LADOT to assess the location for potential integration in a City bike-share program and to determine actual space requirements). The TDM program shall also include the following: • Execution of a Covenant and Agreement to ensure that the TDM program will be maintained. • A one-time fixed-fee of $50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements within the Hollywood area.	• A Transportation Management Office (TMO) with a TDM coordinator; • Distribution of Ridesharing and Transit information; • Marketing and promoting ridesharing with ridesharing events; • On-site kiosks (as needed) located in a centralized area for viewing transit options; • Carpool matching and preferential parking for all ridesharing vehicles; • Pedestrian friendly environment project design; • Convenient and secure parking, facilities and services for bicycle riders; • Guaranteed ride home program for employees; • Transit subsidies such as pre-paid/discounted transit passes or a reduction in parking fees to transit and ridesharing participants; and • A live close to work program to promote trip reduction in travel time and commuting distances for residences and employees. The TDM program shall also include the following: • Space on-site for a future bicycle hub (requires coordination with DOT to assess location for potential integration in a City bike-share program and to determine actual space requirements); • A one-time fixed-fee of $50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements within the Hollywood area; and • A Covenant and Agreement to ensure that the TDM program will be maintained. • Parking costs shall be unbundled from the rental costs of the residential units, requiring those who wish to secure parking spaces to do so at an additional cost from the apartment rental cost. The strategy assumes the parking cost is set by	not in effect at the time of the Approved Project. Therefore, the unbundled parking was not previously a TDM requirement, but is now being included as part of the TDM package.

	the VMT calculator to be a minimum of $135 per month and paid by the vehicle owners/drivers.	
K-3: Prior to issuance of a Certificate of Occupancy and after Project occupancy and implementation of Mitigation Measure K-2 (TDM program), the Project Applicant shall prepare a Neighborhood Traffic Management (NTM) Plan. The Project Applicant shall survey and monitor the traffic on Harold Way between Western Avenue and Wilson Place to assess the level of Project impact. As substantiated (determined by LADOT), the Project Applicant shall coordinate with LADOT, Council District 13, and neighborhood stakeholders along the Harold Way between Western Avenue and Wilton Place to identify neighborhood traffic-calming measures. The Project Applicant shall be responsible for conducting any engineering evaluation of the potential neighborhood traffic-calming measures (for example: street trees, sidewalks, landscaping, neighborhood identification features, pedestrian amenities, etc.) that could be required to determine feasibility regarding drainage, constructability, street design, etc. The Project Applicant shall be responsible for implementing any measures approved by LADOT and supported by stakeholders. It shall be the Applicant's responsibility to implement any approved NTM measures through the Bureau of Engineering's B-Permit process.	**MM-Trans-3 Neighborhood Traffic Management (NTM) Plan** Prior to issuance of a Certificate of Occupancy and after Project occupancy and implementation of Mitigation Measure MM-Trans-2 (TDM program), the Project Applicant shall prepare a Neighborhood Traffic Management (NTM) Plan. The Project Applicant shall survey and monitor the traffic on Harold Way between Western Avenue and Wilson Place to assess the level of Project impact. As substantiated (determined by LADOT), the Project Applicant shall coordinate with LADOT, Council District 13, and neighborhood stakeholders along the Harold Way between Western Avenue and Wilton Place to identify neighborhood traffic-calming measures. The Project Applicant shall be responsible for conducting any engineering evaluation of the potential neighborhood traffic-calming measures (for example: street trees, sidewalks, landscaping, neighborhood identification features, pedestrian amenities, etc.) that could be required to determine feasibility regarding drainage, constructability, street design, etc. The Project Applicant shall be responsible for implementing any measures approved by LADOT and supported by stakeholders. It shall be the Applicant's responsibility to implement any approved NTM measures through the Bureau of Engineering's B-Permit process.	No Change. The original Mitigation Measure provides greater detail than the measure included as part of the requirements listed in LADOT's Letter (August 6, 2019), so the original language has been retained.
K-4: Prior to issuance of a Demolition Permit, the Project Applicant shall prepare a construction work site traffic control plan to be submitted to LADOT for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation,	**MM-Trans-4** Prior to issuance of a Demolition Permit, the Project Applicant shall prepare a construction work site traffic control plan to be submitted to LADOT for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices,	This is included as part of the requirements listed in LADOT's Letter (August 6, 2019). No changes occurred.

protective devices, warning signs, and access to abutting properties. All construction-related traffic shall be restricted to off-peak hours.	warning signs, and access to abutting properties. All construction-related traffic shall be restricted to off-peak hours.	
K-5: All delivery truck loading and unloading shall take place on-site. Deliveries for the retail shops and restaurants shall occur within the parking area. Deliveries for the supermarket shall occur at the two-bay commercial loading area that faces Sunset Boulevard. Trucks delivering to the supermarket shall access the loading area by entering from Harold Way and exiting onto Sunset Boulevard. If delivery trucks are expected during peak hours, a dock manager shall be available on-site to facilitate efficient use of the loading dock. LADOT may recommend additional requirements once a complete review of the loading operations is conducted.	**MM-Trans-5** All delivery truck loading and unloading shall take place on-site. Commercial deliveries shall occur within the parking area. Trucks shall access the loading area by entering from Harold Way and exiting onto Sunset Boulevard. If delivery trucks are expected during peak hours, a dock manager shall be available on-site to facilitate efficient use of the loading dock. LADOT may recommend additional requirements once a complete review of the loading operations is conducted.	This is included as part of the requirements listed in LADOT's Letter (August 6, 2019). The mitigation measure text has updated to reflect changes to the location of the Project's loading areas, which have been reviewed and approved by LADOT. All loading would still be onsite (and thus off the street).
K-6: To facilitate access to the driveways on Harold Way, left-turn channelization shall be installed on northbound Western Avenue at Harold Way and a new eastbound left-turn lane on Harold Way at Western Avenue. The driveway on Sunset Boulevard shall be greater than 30 feet wide in order to facilitate trucks exiting onto Sunset Boulevard.	**MM-Trans-6** To facilitate access to the driveways on Harold Way, left-turn channelization shall be installed on northbound Western Avenue at Harold Way and a new eastbound left-turn lane on Harold Way at Western Avenue. The driveway on Sunset Boulevard would need to be greater than 30 feet wide in order to facilitate trucks exiting onto Sunset Boulevard.	This is included as part of the requirements listed in LADOT's Letter (August 6, 2019). No changes occurred.

Freeway Analysis

A supplemental Freeway Safety evaluation is included per the Interim Guidance for Freeway Safety Analysis memorandum issued by LADOT on May 1, 2020. The purpose of this memorandum is to provide interim guidance on the preparation of freeway safety analysis for land use proposals that are required by LADOT to prepare Transportation Assessments.

While a freeway safety evaluation was not analyzed for the Approved Project under this guidance, as the Approved Project's Traffic Study was completed prior to the release of the current interim guidance, an evaluation utilizing this guidance has been conducted for the Approved Project, and is discussed here for comparison purposes between the Approved and Revised Projects.

Caltrans District 7 has requested that environmental analyses for new land use development projects include freeway off-ramp safety considerations. Specifically, Caltrans has generally requested that the City evaluate development project effects on vehicle queuing on freeway off-ramps. In response, LADOT has developed the following criteria for a project freeway safety analysis to be included in Transportation Assessments for land development projects.

The initial step is to identify the number of project trips expected to be added to nearby freeway off-ramps serving the project site. If the project adds 25 or more trips to any off ramp in either the morning or afternoon peak hour, then that ramp should be studied for potential queuing impacts. If the project is not expected to generate more than 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required.

As demonstrated in Chapter 4 of the traffic study approved by LADOT on August 2019, the Revised Project freeway traffic at any freeway off-ramp will not exceed 25 peak hour trips. As shown in Figures 6 and 7 of Appendix G-4, the Revised Project's freeway off-ramp traffic is below 25 peak hour trips at all the nearby off ramps used by the project.

Similarly, the Approved Project traffic at any freeway off-ramp will also not exceed 25 peak hour trips, as shown in the EIR's traffic study (included as Appendix G-1 to the Approved EIR).

No further freeway safety analysis is necessary for either the Approved Project or the Revised Project using this guidance criteria and impacts would be less than significant for both.

Design Hazards

Similar to the Approved Project, the Revised Project complies with the Mobility Plan standards in terms of design for vehicular access, which accommodates all vehicular and pedestrian traffic by providing adequate access capacity and spreading the vehicular traffic in order to not overload any street or pedestrian crossing. Access for the Revised Project would not substantially change as compared to the Approved Project. There would be two proposed driveways on Sunset Boulevard and two proposed driveways on Harold Way. The driveway operations would not change. The only change would be that the Sunset Boulevard eastern driveway would shift 18 feet to the west (from 132 feet to 150 feet from Western Avenue). No other change would occur. Access has been specifically designed so residential and commercial parking can be accessed from either street. No deficiencies are apparent in the revised site access plans which would now be considered significant. LADOT has approved the Revised Project's vehicular access and site plan in their letter dated August 6, 2019. As such, similar to the Approved Project, the Revised Project's impacts in terms of design hazards would be less than significant.

Emergency Access

Similar to the Approved Project, all emergency ingress/egress associated with the Revised Project would be designed and constructed in conformance to all applicable LADBS, LADOT, and LAFD standards and requirements for design and construction. Mitigation Measure **MM-Trans-4** would be implemented for a construction work site traffic control plan. This would also ensure pedestrian safety. There are adequate sidewalks and crosswalks around the Site and at

signal-controlled intersection. The Revised Project would not affect these facilities. The Revised Project would not create any hazards and would not result in inadequate emergency access. Therefore, impacts under the Revised Project relating to emergency access would be similar to those of the Approved Project, and would be less than significant.

Nonetheless, similar to the Approved Project, the Revised Project would implement **Mitigation Measures Trans-4, Trans-5, and Trans-6** addressing site access, as shown in **Table 4-27**, above. The mitigation measures would require a construction work site traffic control plan, operational standards for delivery loading and unloading, and a requirement for left-turn channelization on northbound Western Avenue at Harold Way and a new eastbound left-turn lane on Harold Way at Western Avenue to facilitate access to the driveways on Harold Way. Although impacts regarding design hazards and emergency access were determined to be not significant, these requirements would further reduce any potential impacts.

Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.17.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to transportation. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.17.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to transportation impacts. The City adopted a VMT methodology on July 30, 2019 and interim guidance for Freeway Safety Analysis on May 1, 2020. The Final EIR was released on January 26, 2018. Therefore, VMT and a Freeway Safety Analysis was not required at that time and is not discussed in the Approved EIR. However, a comparison of the VMT reports and Freeway Safety Analyses for the Approved Project and the Revised Project were conducted. No significant VMT impacts are associated with either project after the implementation of the recommended TDM programs. No significant freeway safety impacts are associated with either project prior to mitigation. No substantial changes in the environment related to transportation have occurred since certification of the EIR, and no substantial new significant traffic sources have been identified within the vicinity of the Revised Project that would result in new or more severe significant environmental impacts related to transportation.

4.17.5 Mitigation Measures Addressing Impacts

The mitigation measures adopted by the Final EIR, and as modified as described above in **Table 4-27** for the Revised Project, are listed below:

MM-Trans-1 Physical Improvements

Prior to the issuance of a Certificate of Occupancy, the Project Applicant shall implement the following roadway improvements:

Hollywood Boulevard and Western Avenue

a. Install a CCTV camera and the necessary infrastructure (including fiber optic and interconnect) at Western Avenue and Hollywood Boulevard;

b. Upgrade the traffic signal controller to a Type 2070 controller at the intersection of Western Avenue and Russell Avenue; and

c. Install additional system detector loops along both approaches of Hollywood Boulevard and Harvard Boulevard.

Sunset Boulevard and Western Avenue

a. Dedicate two feet and widen the west side of Western Avenue by seven feet from north of Sunset Boulevard to Harold Way to allow for the installation of a southbound right-turn lane on Western Avenue. The ultimate design of this improvement should maintain a minimum sidewalk/parkway width of 15 feet along the west side of Western Avenue north of Sunset Boulevard, and should provide one left-turn lane, two through lanes, and one right-turn lane in the southbound direction; and

b. Install a CCTV camera and the necessary infrastructure (including fiber optic and interconnect) at Sunset Boulevard and Western Avenue.

These signal upgrades should be implemented either by the applicant through the B-permit process of the Bureau of Engineering (BOE), or through payment to DOT to fund the cost of the upgrades. If DOT selects the payment option, then the applicant would be required to pay DOT the cost to design and construct the upgrades. If the upgrades are implemented by the applicant through the B-Permit process, then these traffic signal improvements must be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy in accordance with the project's traffic mitigation phasing plan. Temporary certificates of occupancy may be granted in the event of any delay through no fault of the applicant, provided that, in each case, the applicant has demonstrated reasonable efforts and due diligence to the satisfaction of DOT.

For all of the proposed intersection improvements, the final determination on the feasibility of street widening shall be made by BOE. All proposed street improvements and associated traffic signal work within the City of Los Angeles must be guaranteed through BOE's B-Permit process, prior to the issuance of

any building permit and completed prior to the issuance of any certificate of occupancy. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator, at (213) 972-8687, to arrange a pre-design meeting to finalize the proposed design. Costs related to any relocation of bus zones and shelters and to modifying or upgrading traffic signal equipment that are necessary to implement the proposed mitigations shall be incurred by the applicant. In the event the originally proposed mitigation measures become infeasible, substitute mitigation measures of an equivalent cost may be provided, subject to approval by DOT, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the project's significant impact.

Construction of the Target project at 5520 West Sunset Boulevard on the southwest corner of Sunset Boulevard and Western Avenue has not yet been completed. The mitigation measures described above for the intersection of Sunset Boulevard and Western Avenue have been assigned to the Target project; however, consistent with DOT policy, the cost of mitigation measures can be shared between two developments provided that the improvement can mitigate the combined impact of the projects. At Western Avenue and Sunset Boulevard, Target is required to widen Western Avenue by five feet for a distance of approximately 160 feet north of the intersection. However, a two-foot dedication is required of the SunWest project which allows a seven-foot widening to satisfy the City street standard for Western Avenue. If both projects are constructed then the preferred mitigation at Western Avenue and Sunset Boulevard is to construct a third through lane southbound in lieu of a right-turn only lane ultimately providing one left-turn lane, two through lanes, and one shared through/right-turn lane in the southbound direction. A fair share mitigation sharing program for this intersection will be necessary if both projects move forward. If Target is not constructed then the mitigation measures listed above would be standalone mitigation.

MM-Trans-2 Transportation Demand Management (TDM) Plan

A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The preliminary plan will include, at minimum, measures consistent with the City's Trip Reduction Ordinance. The following measures were included in the traffic study as a startup TDM program:

- A Transportation Management Office (TMO) with a TDM coordinator;
- Distribution of Ridesharing and Transit information;
- Marketing and promoting ridesharing with ridesharing events;

- On-site kiosks (as needed) located in a centralized area for viewing transit options;
- Carpool matching and preferential parking for all ridesharing vehicles;
- Pedestrian friendly environment project design;
- Convenient and secure parking, facilities and services for bicycle riders;
- Guaranteed ride home program for employees;
- Transit subsidies such as pre-paid/discounted transit passes or a reduction in parking fees to transit and ridesharing participants; and
- A live close to work program to promote trip reduction in travel time and commuting distances for residences and employees.

The TDM program shall also include the following:

- Space on-site for a future bicycle hub (requires coordination with DOT to assess location for potential integration in a City bike-share program and to determine actual space requirements);
- A one-time fixed-fee of $50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements within the Hollywood area; and
- A Covenant and Agreement to ensure that the TDM program will be maintained.
- Parking costs shall be unbundled from the rental costs of the residential units, requiring those who wish to secure parking spaces to do so at an additional cost from the apartment rental cost. The strategy assumes the parking cost is set by the VMT calculator to be a minimum of $135 per month and paid by the vehicle owners/drivers.

MM-Trans-3 Neighborhood Traffic Management (NTM) Plan

Prior to issuance of a Certificate of Occupancy and after Project occupancy and implementation of Mitigation Measure MM-Trans-2 (TDM program), the Project Applicant shall prepare a Neighborhood Traffic Management (NTM) Plan. The Project Applicant shall survey and monitor the traffic on Harold Way between Western Avenue and Wilson Place to assess the level of Project impact. As substantiated (determined by LADOT), the Project Applicant shall coordinate with LADOT, Council District 13, and neighborhood stakeholders along the Harold Way between Western Avenue and Wilton Place to identify neighborhood traffic-calming measures. The Project Applicant shall be responsible for conducting any

engineering evaluation of the potential neighborhood traffic-calming measures (for example: street trees, sidewalks, landscaping, neighborhood identification features, pedestrian amenities, etc.) that could be required to determine feasibility regarding drainage, constructability, street design, etc. The Project Applicant shall be responsible for implementing any measures approved by LADOT and supported by stakeholders. It shall be the Applicant's responsibility to implement any approved NTM measures through the Bureau of Engineering's B-Permit process.

MM-Trans-4 Prior to issuance of a Demolition Permit, the Project Applicant shall prepare a construction work site traffic control plan to be submitted to LADOT for review and approval prior to the start of any construction work. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. All construction-related traffic shall be restricted to off-peak hours.

MM-Trans-5 All delivery truck loading and unloading shall take place on-site. Commercial deliveries shall occur within the parking area. Trucks shall access the loading area by entering from Harold Way and exiting onto Sunset Boulevard. If delivery trucks are expected during peak hours, a dock manager shall be available on-site to facilitate efficient use of the loading dock. LADOT may recommend additional requirements once a complete review of the loading operations is conducted.

MM-Trans-6 To facilitate access to the driveways on Harold Way, left-turn channelization shall be installed on northbound Western Avenue at Harold Way and a new eastbound left-turn lane on Harold Way at Western Avenue. The driveway on Sunset Boulevard would need to be greater than 30 feet wide in order to facilitate trucks exiting onto Sunset Boulevard.

4.17.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.18 Tribal Cultural Resources

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
TRIBAL CULTURAL RESOURCES: Would the project:					
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, please, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
(i) Listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	Less Than Significant	No	No	No	No
(ii) A resource determined by the lead agency in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Less Than Significant	No	No	No	No

4.18.1 Impact Determination in the EIR

These checklist questions relating the Tribal Cultural Resources were not explicitly included in the Draft EIR, but impacts relating to cultural resources and human remains were fully analyzed in the EIR, and the change to the Appendix G thresholds to include a new Tribal Cultural Resource section is responded to in Section III, Response to Comments, of the Final EIR. As stated in Response to Comment NAHC Comment 1, the Draft EIR preparation was initiated in October 2015, prior to the effective date of the changes to the State CEQA Guidelines, and was released October 2016, immediately after the effective date of changes. However, the City undertook and concluded tribal consultation meeting the requirements of AB52, and the results of this consultation process are included in Appendix B to the Final EIR. On July 8, 2015, as

part of the preparation of the Draft EIR for the SunWest Project, a Sacred File and Native American Contacts List was requested from the NAHC. NAHC responded to the request in a letter dated August 11, 2015 and included a Native American Heritage Commission Tribal Consultation List. In accordance with AB 52, on July 27, 2015, letters were mailed to all of the contacts on the Tribal Consultation List provided by NAHC. None of these tribal contacts responded, and the City received no requests for consultation. The City determined that no substantial evidence exists to support a conclusion that the Project may cause a significant impact on tribal cultural resources. Therefore, the City has no basis under CEQA to impose any related mitigation measures for impacts to tribal cultural resources. The City also included a standard condition of approval for the protection of tribal cultural resources in case of inadvertent discovery:

> In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities[1], all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:
>
> - Upon a discovery of a potential tribal cultural resource, the project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning.
>
> - If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.
>
> - The Applicant shall implement the tribe's recommendations if a qualified archaeologist and a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.
>
> - The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

4.18.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project is in the same location as the Approved Project, and will include greater excavation activities due to an additional subterranean level of parking. The City already determined that no substantial evidence exists to support a conclusion that the Project Site may contain tribal cultural resources or cause a significant impact on tribal cultural resources

Therefore, although the Revised Project will increase excavation on the site, it would not likely result in new or increased significant impacts beyond those already identified in the previously adopted EIR. In addition, the Revised Project would be subject to the same condition of approval as the Approved Project for the inadvertent discovery of resources.

4.18.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to tribal cultural resources. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.18.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to tribal cultural resources not discussed in the EIR, significant effects related to tribal cultural resources previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.18.5 Mitigation Measures Addressing Impacts

Since the EIR determined the Project would have no impact on tribal cultural resources, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.18.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.19 Utilities and Service Systems

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
UTILITIES AND SERVICE SYSTEMS: Would the project:					
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction of which could cause significant environment effects?	Less Than Significant	No	No	No	No
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant	No	No	No	No
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant	No	No	No	No
(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less Than Significant	No	No	No	No
(e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?	Less Than Significant	No	No	No	No

This section is based on the following item, which is included as **Appendix H** to this Addendum:

H Utilities Technical Memorandum, PSOMAS, August 21, 2019.

4.19.1 Impact Determination in the EIR

As shown on Table IV.L.1-2 of the Draft EIR, the Project is estimated to generate a net total of approximately 31,958 gallons per day (or 0.03 million gallons per day) of wastewater. Wastewater generated by the Project would flow to the Hyperion Treatment Plant (HTP), which has adequate capacity to treat the Project's wastewater. As part of the Project's permit process, the City would conduct further detailed gauging and evaluation to identify specific sewer connection points. If additional sewer line capacity is needed to serve the Project, the Project

Applicant would be required to install adequately sized sewer lines. Thus, sewer infrastructure would be adequate to accommodate the Project. Therefore, Project impacts related to wastewater service would be less than significant.

As shown on Table IV.L.2-9 of the Draft EIR, the Project would result in a net increase of approximately 31,631 gallons per day of water consumption. This estimated water consumption does not take into consideration the effectiveness of current water conservation measures that are required by the City. The 2015 Urban Water Management Plan (UWMP) projects a supply of 642,000 AFY (acre-feet per year) in 2020 and rising to 676,900 in 2025. According to LADWP, any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) will be offset with MWD purchases to rise to the level of demand. Overall, any project that is consistent with the General Plan has been taken into account in the planned growth in water demand. As discussed in Section IV.G, Land Use and Planning, the Project is consistent with the General Plan. In addition, the Project would be required to comply with all applicable mandatory water conservation in the Los Angeles Green Building Code. Further, the Project would be required to comply with the City's Emergency Water Conservation Plan. Therefore, Project impacts related to water supply would be less than significant.

Construction waste would be generated during demolition and construction activities. It is anticipated that grading and demolition activities would be completed within the first year of Project construction. Based on demolition and construction waste generation rates estimated by the U.S. EPA's Characterization of Building-Related Construction and Demolition Debris in the United States, the Project is predicted to generate a total of approximately 3,071 tons of solid waste during demolition and 665 tons of solid waste over the construction period (see Table IV.L.3-2 of the Draft EIR).

The demolition and construction debris associated with the Project would primarily be classified as inert waste and would be recycled in accordance with Ordinance 181,519 at one of the City certified construction and demolition waste processor facilities. As noted above, the Mesquite Landfill would have adequate capacity to accept the Project's demolition and construction waste. In order to comply with AB 939, a minimum of 50 percent of demolition and construction debris must be recycled. Through compliance with applicable City regulations and contracting with approved waste haulers, the Project would achieve, at a minimum, the required 70 percent source reduction and recycling rate. Furthermore, recycling facilities (such as American Waste Transfer Station, Compton Recycling and Transfer Station, Carson Transfer Station and Materials Recovery Facility, Waste Resources Recovery, Falcon Refuse Center Inc., and the Southeast Resource Recovery Facility) would be available to receive recyclable construction waste. Additional recycling facilities and inert waste landfills (which are able to accept fill dirt, concrete, glass, etc.) are listed in the Bureau of Sanitation's Construction and Demolition Recycling Guide and would be utilized as needed. Therefore, with implementation of existing regulatory standards that require recycling of most of the solid waste generated by the construction of the Project, short-term construction impacts to landfills and solid waste services would be less than significant.

As shown on Table IV.L.3-3 of the Draft EIR, it is estimated operation of the Project would generate a net total of approximately 1.81 tons per day (tpd) of solid waste. The total was reduced by the solid waste generation of the existing uses, which would be removed and/or re-used. This total is a conservative and does not account for the effectiveness of recycling efforts, which the Project would be required by the City to implement. The Sunshine Canyon Landfill would have adequate capacity to accommodate the Project's solid waste. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. Already in fiscal year 2013, the City achieved a waste diversion rate of 76.4 percent, exceeding the required 50 percent diversion rate required by AB 939. The City is on track toward its goal to achieve a 90 percent diversion by 2025. Thus, the Project would not require new or expanded landfill capacity. Therefore, Project impacts related to solid waste would be less than significant.

4.19.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As shown on **Table 4-28**, the Revised Project is estimated to generate a net total of approximately 74,200 gallons per day (or 0.07 million gallons per day) of wastewater, more than double the wastewater of the Approved Project. However, with a remaining daily capacity of 175 mgd, the HTP would have adequate capacity to serve the Project's projected 0.07 mgd generation. Therefore, similar to the Approved Project, no significant impacts related to wastewater treatment would occur and the Project would be adequately served by the City's wastewater facilities. A Wastewater Service Information (WWSI) was submitted to the City of Los Angeles Bureau of Sanitation (BOS) for a split discharge with 50% of the project sewer flowing to Sunset Boulevard and 50% of the project sewer flowing to Western Avenue. This review evaluates the existing sewer system to determine if there is adequate capacity to safely convey sewage from proposed development projects, proposed construction projects, proposed groundwater dewatering projects and proposed increases of sewage from existing facilities. The WWSI was requested from BOS and approved on May 6, 2019 and updated on August 5, 2019 for the Project demand of 74,200 GPD. No service upgrades will be needed.

As part of the Project's permit process, the City would conduct further detailed gauging and evaluation to identify specific sewer connection points. If additional sewer line capacity is needed to serve the Project, the Project Applicant would be required to install adequately sized sewer lines. Thus, sewer infrastructure would be adequate to accommodate the Revised Project. Therefore, impacts related to wastewater service would be less than significant.

Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

Table 4-28
Estimated Wastewater Generation

Land Use	Size	Rates	Total (gpd)
Residential - Studio	176 units	75 gallons / unit	13,200
Residential – 1-bedroom	163 units	110 gallons / unit	17,930
Residential – 2-bedroom	73 units	150 gallons / unit	10,950
Fitness Center	2,232 sf	200 gallons / 1,000 sf	446
Restaurant	10,564 sf	300 gallons / 1,000 sf	3,169
Market	23,940 sf	50 gallons / 1,000 sf	1,197
Office	1,190 sf	120 gallons / 1,000 sf	143
Lobbies	4,749 sf	50 gallons / 1,000 sf	237
Pool	3,600 cubic feet	7.48 gallons / cubic feet	26,928
		Total	**74,200**

Note: sf = square feet; gpd = gallons per day
Rates: Sewage Generation Factor, effective date April 6, 2012.
Table: Utilities Technical Memorandum, PSOMAS, August 21, 2019.

Regarding water consumption, the 2015 UWMP was adopted in June 2016 and projects a demand of 611,800 AFY in 2020 and 644,700,000 AFY in 2025.[48] The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multi-family, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG 2012 RTP.[49] The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).[50] Neither the UWMP forecasts, nor the 2012 RTP include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Revised Project would fit.

As shown on **Table 4-29**, the Revised Project would demand an increase of approximately 81,620 gallons of water per day (or 0.08 mgd), or more than double the water demand of the Approved Project. This total does not take any credit for any proposed sustainable and water conservation features of the Project nor does it reflect the net increase since no credit is taken for existing uses that would be removed. This is a worst-case, conservative approach. With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project's projected demand for treatment of 0.05 mgd. Therefore, no significant

48 2015 Urban Water Management Plan, Los Angeles, pg. ES-23.
49 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.
50 SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

impacts related to water treatment would occur and the Revised Project would be adequately served by existing treatment facilities.

Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

Table 4-29
Estimated Water Demand

Land Use	Size	Rates	Total (gpd)
Residential - Studio	176 units	75 gallons / unit	13,200
Residential – 1-bedroom	163 units	110 gallons / unit	17,930
Residential – 2-bedroom	73 units	150 gallons / unit	10,950
Fitness Center	2,232 sf	200 gallons / 1,000 sf	446
Market	23,940 sf	50 gallons / 1,000 sf	1,197
Restaurant	10,564 sf	300 gallons / 1,000 sf	3,169
Office	1,190 sf	120 gallons / 1,000 sf	143
Lobbies	4,749 sf	50 gallons / 1,000 sf	237
Pool	3,600 cubic feet	7.48 gallons / cubic feet	26,928
Irrigation	-	10%	7,420
		Total	**81,620**

Note: sf = square feet; gpd = gallons per day
Wastewater generation is assumed to equal water consumption.
Rates: Sewage Generation Factor, effective date April 6, 2012.
Table: Utilities Technical Memorandum, PSOMAS, August 21, 2019.

Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or unclassified landfills. Non-hazardous municipal solid waste is disposed in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in unclassified landfills.[51] Ten Class III landfills and one unclassified landfill with solid waste facility permits are located within Los Angeles County.[52] Of the ten Class III landfills in Los Angeles County, five Class III landfills are open to the City of Los Angeles.[53] The Class III landfills have an estimated remaining capacity of 167.58 million tons,

51 Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

52 The ten Class III landfills within Los Angeles County include: Antelope Valley, Burbank, Calabasas, Chiquita Canyon, Lancaster, Pebbly Beach, San Clemente, Savage Canyon, Scholl Canyon, and Sunshine Canyon City/County. The total number of Class III landfills within Los Angeles County excludes the Puente Hills Landfill, which closed on October 31, 2013. The unclassified landfill within the Los Angeles County is the Azusa Land Reclamation facility.

53 The five Class III landfills open to the City of Los Angeles include: Antelope Valley, Calabasas, Chiquita Canyon, Lancaster, and Sunshine Canyon City/County. Note that while the Calabasas Landfill is open to the City of Los Angeles, its service area is limited to the cities of Hidden Hills, Agoura Hills, Westlake Village, and Thousand Oaks per Los Angeles County Ordinance No. 91-0003.

with 149.77 million tons open to the City. The unclassified landfill serving the County is Azusa Land Reclamation with an estimated 55.71 million tons of remaining capacity.[54]

Pursuant to the requirements of Senate Bill 1374[55], the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of nonhazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the unclassified landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City.

As shown in **Table 4-30**, after accounting for mandatory recycling, the Revised Project would result in approximately 747 tons of construction waste. This is an increase of 82 tons as compared to the Approved Project. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 55.71 million tons, as well as the remaining 149.77 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction solid waste disposal needs.

Table 4-30
Revised Project Demolition and Construction Waste Generation

Building	Size	Rate	Total (tons)
Demolition Waste			
Retail	26,457 sf	155 pounds / sf	2,050
Construction Waste			
Residential	396,269 sf	4.38 pounds / sf	868
Non-Residential	35,694 sf	3.89 pounds / sf	69
Total			**2,987**
Total after 75% recycling			**747**

Note: sf = square feet; 1 ton = 2,000 pounds.
Rate: U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 3, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.
Table: CAJA Environmental Services, June 2019.

As shown on **Table 4-31**, operation of the Project would generate an increase of approximately 935.3 tons per year). This is an increase of 275 tons as compared to the Approved Project. The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with Assembly Bill 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's

54 County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, April 2019.

55 Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.[56]

The increase in solid waste disposal would represent an approximate 0.03 percent increase in the City's annual solid waste disposal quantity, based on the 2017 disposal of approximately 3.2 million tons. The increase in solid waste disposal would represent approximately 0.001 percent of the estimated remaining Class III landfill capacity of 149.77 million tons available to the City of Los Angeles.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Revised Project. Therefore, impacts would be less than significant.

Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

Table 4-31
Estimated Solid Waste Generation

Land Use	Size	Rates	Total (tons/year)
Existing Uses (to be removed)			
Retail	26,457 sf	5 lbs / 1,000 sf	(24)
Proposed Uses			
Residential	412 units	12.23 lbs / unit	920
Market	23,940 sf	6 lbs / 1,000 sf	26
Restaurant	10,564 sf	6 lbs / 1,000 sf	12
Office	1,190 sf	6 lbs / 1,000 sf	1.3
Net Total			**935.3**

Note: sf = square feet; 1 ton = 2,000 pounds.
Rates (residential): City of Los Angeles CEQA Thresholds Guide, 2006, page M.3-2.
Residential solid waste factor is based on a rate of 12.23 pounds per household per day (or 2.23 tons per household per year).
Rates (non-residential): City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study Table 4, July 2002.
Table: CAJA Environmental Services, June 2019.

4.19.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant

[56] The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise," www.lacitysan.org/san/faces/ home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlaf;jsessionid=nJABd_CcLHL4DCOkGSCJWv1buV9at yQtoUkP50TwYHe5jczy6OaK!782088041!NONE?_afrLoop=17071741526736871&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D17071741526736871%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4

impacts beyond those already identified in the previously adopted EIR relative to utilities and service systems. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.19.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to utilities impacts. No substantial changes in the environment related to recreation have occurred since certification of the EIR, and no substantial new significant resources have been identified within the vicinity of the Revised Project that would result in new or more severe significant environmental impacts related to utilities.

4.19.5 Mitigation Measures Addressing Impacts

Since the EIR determined the Project would have a less than significant impact on utilities, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.19.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.20 Wildfire

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No Impact	No	No	No	No
(b) Due to slop, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No Impact	No	No	No	No
(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No Impact	No	No	No	No
(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff post-fire slope instability, or drainage change?	No Impact	No	No	No	No

4.20.1 Impact Determination in the EIR

Wildfire pertains to projects that are located in, or near, state responsibility areas or lands classified as very high fire hazard severity zones. The Project Site is not located in or near state responsibility areas, nor is the Project Site located in a City-designated Very High Fire Hazard Severity Zone. Therefore, these questions are not applicable to the Project Site and no impact would occur.

4.20.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would be on the same site as the Approved Project. No new analysis is needed. Therefore, the Revised Project would not result in new or increased significant impacts beyond those already identified in the previously adopted EIR.

4.20.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to wildfire. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.20.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified related to one or more significant effects related to wildfire not discussed in the EIR, significant effects related to wildfire previously examined that will be substantially more severe than shown in the EIR, or of mitigation measures previously determined to be infeasible which have now been determined to be feasible.

4.20.5 Mitigation Measures Addressing Impacts

Since the EIR determined the Project would have a less than significant impact on wildfire, no mitigation measures were required. Implementation of the Revised Project does not change these impact determinations. Therefore, no additional mitigation measures are required.

4.20.6 Conclusion

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

4.21 Mandatory Findings of Significance

Issues (and supporting Information Sources)	Impact Determination in EIR	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	EIR's Mitigation Measures Addressing Impact
MANDATORY FINDINGS OF SIGNIFICANCE:					
(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	No Impact	No	No	No	No
(b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when view in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	Less Than Significant	No	No	No	No
(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	Less Than Significant	No	No	No	No

4.21.1 Impact Determination in the EIR

The Approved Project would not degrade the quality of the environment, affect biological species or resources, or eliminate important examples of California history or prehistory. The Project site is located in an urbanized area of the City. The site is completely developed with commercial and parking land uses and does not contain any riparian habitat or sensitive natural community. No historical resources are located at the Project site. The Project would not result in significant cumulative impacts in of the other environmental topic areas.

The Approved Project would allow for the development of residential and retail land uses. During long-term operation of the Project, some hazardous materials such as solvents, cleaners, and petroleum products could be used and stored at the site. However, the amounts of these materials that would be present at the site would be relatively minimal, and the users of these materials would be required to comply with all local, state, and federal laws pertaining to the management of hazardous materials and wastes. Through compliance with these laws, the Project would not cause adverse effects on human beings, either directly or indirectly.

4.21.2 Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Revised Project would not result in new significant impacts or severe impacts as compared to the Project. As the program uses are similar and the location is the same, the Revised Project would not affect biological or historic resources and would not cause adverse effects on human beings, either directly or indirectly. While both the Approved Project and Revised Project have a neighborhood traffic intrusion and result in a significant impact, the Revised Project has a lower severity of impact. Therefore, the Revised Project does not result in new significant impacts or substantially more severe impacts.

4.21.3 Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

No substantial changes would occur with respect to the circumstances under which the Revised Project would be undertaken which would result in new or substantially increased significant impacts beyond those already identified in the previously adopted EIR relative to mandatory findings of significance. Therefore, there are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the EIR.

4.21.4 Any new Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to environmental topics covered in the Mandatory Findings of Significance. No substantial changes in the environment have occurred since certification of the EIR, and no substantial new significant biological or cultural resources have been identified within the vicinity of the proposed Revised Project that would result in new or more severe significant environmental impacts.

4.21.5 Conclusions

Based on the above, the Revised Project will not result in any of the conditions set forth in PRC Section 21166(c) or CEQA Guidelines Sections 15162 or 15163 that would require the preparation of a Supplemental or Subsequent EIR.

5 Cumulative Impacts

5.1 Aesthetics

No cumulative impact was identified. The nearest related project is an under-construction retail development at 5520 Sunset (south across the street). This is the same related project that was included in the EIR's cumulative analysis. The Revised Project would have similar massing as the Project. The Revised Project would be located on the same Site. The conclusion would not be affected by the Revised Project.

5.2 Air Quality

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable. Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. Project impacts with regard to air quality would not be cumulatively considerable, and cumulative impacts would be less than significant. The conclusion would not be affected by the Revised Project.

5.3 Cultural Resources

Due to the site-specific nature of cultural resources, impacts are typically assessed on a project-by-project basis, rather than on a cumulative basis. As with the Project, all related projects and other future development projects would be subject to established guidelines and regulations pertaining to identification and protection of a potential resource. Project impacts with regard to cultural resources would not be cumulatively considerable, and cumulative impacts would be less than significant. The conclusion would not be affected by the Revised Project.

5.4 Geology and Soils

Due to the site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), geology impacts are typically assessed on a project-by-project basis, rather than on a cumulative basis. Geotechnical impacts related to future development in the City involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. As with the Project, all related projects and other future development projects would be subject to established guidelines and regulations pertaining to building design and seismic safety, including those set forth in the California Building Code and Los Angeles Building Code. Project impacts with regard to geology and soils would not be cumulatively considerable, and cumulative impacts would be less than significant. The conclusion would not be affected by the Revised Project.

5.5 Greenhouse Gas Emissions

The analysis of a project's GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the cumulative levels. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emission. The Project is consistent with these climate action plans at the State, regional, and local level. As such, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable. The conclusion would not be affected by the Revised Project.

5.6 Hazards and Hazardous Materials

The geographic extent of the Project's environmental impacts would be limited to the Project site and would not contribute to any other potential environmental impact that may occur beyond the Project site boundaries. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, lead-based paint, PCBs, and oil and gas, and would be required to comply with all applicable local, state, and federal laws, rules, and regulations. Project impacts with regard to hazards would not be cumulatively considerable, and cumulative impacts would be less than significant. The conclusion would not be affected by the Revised Project.

5.7 Hydrology and Water Quality

The sites of the Project and the related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since all new development is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and to incorporate appropriate stormwater pollution control measures into

the design plans to ensure that water quality impacts are minimized. The conclusion would not be affected by the Revised Project.

5.8 Land Use and Planning

Given the built-out conditions of the greater Los Angeles region, including the Project area, cumulative development likely would convert existing underutilized properties in the Los Angeles area to revitalized higher-density developments to respond to the need for housing, sources of employment, and associated retail land uses. As with the Project, the related projects would be required to comply with relevant land use policies and regulations through review by City regulatory agencies and would be subject to CEQA review. Based on the mix of uses and buildings that currently comprise the area, as well as the related projects that are proposed, approved, or are under construction, the Project would be compatible with the various existing developments and related projects in the immediate vicinity of the Project Site and surrounding area. The Project would implement important local and regional goals and policies for the Los Angeles area, which would assist the City in achieving short- and long-term planning goals and objectives related reducing urban sprawl, efficiently utilizing existing infrastructure, reducing regional congestion, and improving air quality through the reduction of VMT, while helping the City meet its housing needs. Likewise, future development associated with the related projects would support the furtherance of the buildout of Los Angeles and the surrounding area. This is consistent with SCAG and other regional policies for promoting more intense land uses adjacent to transit stations and job centers, providing a variety of housing options, and increasing the number of retail and commercial uses. Further, all related projects in the City would be subject to the same local development and mitigation standards as the Project. Finally, none of the related projects is located close enough to the Project site to create a cumulatively significant land use impact. Project impacts with regard to land use would not be cumulatively considerable, and cumulative impacts would be less than significant. The conclusion would not be affected by the Revised Project.

5.9 Noise

With respect to the retail project located across Sunset from the Project at 5520 Sunset Boulevard, it would not be expected to contribute to cumulative noise levels because current construction on the site is beyond the phases requiring noise-intensive heavy-duty construction vehicles, such as scrapers or bulldozers. The hand-held tools pneumatic devices, and other smaller equipment necessary for its completion would create minimal noise levels compared to motorized construction vehicles associated with grading, paving, and other more intensive phases of construction.

The other Related Projects are further away from the Project Site than the analyzed sensitive receptors for noise and impacts were shown to be less than significant. Any construction noise, were it to occur concurrently with the Project, would be attenuated by the distance between the Related Projects, the Project Site, and sensitive receptors. In addition, each of the Related

Projects would be required to comply with the City's noise ordinance, as well as implement any mitigation measures that may be prescribed pursuant to CEQA.

Given the attenuation of noise over distance and the high ambient noise levels along Sunset Boulevard at this location, these smaller pieces of equipment would not be audible at receptors of the Project. Given the high ambient noise levels of the Project area and the presence of many buildings and barriers that would obstruct line-of-sight noise travel from these other related projects to Project receptors, on-site construction-related noises from their development would be inaudible. With regard to off-site construction noise from haul trucks, the Project itself would have less than significant impacts. Given the location of the cumulative projects, no haul routes would be expected to intersect along roadways with numerous adjacent sensitive receptors, especially residential ones. As a result, cumulative off-site haul truck noise would have no impact.

Project impacts with regard to noise would not be cumulatively considerable, and cumulative impacts would be less than significant. The conclusion would not be affected by the Revised Project.

5.10 Population and Housing

The Project's housing and population growth would be consistent with the anticipated growth for the Project area and in the General Plan. The Project would not create unplanned growth, and impacts related to population and housing would be less than significant. As such, regardless of whether the related projects would result in unplanned growth, the Project would not be cumulatively considerable and would not have the potential to contribute to any potential cumulative impact. The conclusion would not be affected by the Revised Project.

5.11 Public Services

Given the geographic range of the Related Projects, they would be served by a variety of fire stations.[57] The Project, in combination with the Related Projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and Related Projects would contribute. Similar to the Project, the Related Projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-density buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance with existing regulations and LAMC, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Project impacts with regard to fire services would not be cumulatively considerable, and cumulative impacts would be less than

[57] LAFD Fire Station Finder: http://www.lafd.org/fire_stations/find_your_station

significant. The conclusion would not be affected by the Revised Project.

The Project, in combination with the Related Projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and Related Projects would contribute. Similar to the Project, the Related Projects would be subject to the review and oversight of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance with existing regulations and LAMC, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Project impacts with regard to police protection would not be cumulatively considerable, and cumulative impacts would be less than significant. The conclusion would not be affected by the Revised Project.

The Project, in combination with the Related Projects, is expected to result in a cumulative increase in the demand for school services. However, similar to the Project, the applicants of all the Related Projects would be required to pay the state mandated applicable school fees to the LAUSD to ensure that no significant impacts to school services would occur. Therefore, Project impacts with regard to schools would not be cumulatively considerable, and cumulative impacts would be less than significant. The conclusion would not be affected by the Revised Project.

The Project, in combination with the Related Projects, would result in an increase in permanent residents residing in the Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio. However, employees generated by the commercial projects and the commercial portions of mixed-use projects on the Related Projects list would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities. Therefore these project-generated employees would not significantly contribute to the future demand on park and recreational facility services. The applicants of related residential projects would be subject to the City's parkland fees (e.g., Quimby Fees and/or Park and Recreation fees for non-subdivision projects) and to minimum open space requirements, ensuring that any potential impacts to parks and recreational facilities would be less than significant. Therefore, Project impacts with regard to recreation would not be cumulatively considerable, and cumulative impacts would be less than significant. The conclusion would not be affected by the Revised Project.

Given the geographic range of the Related Projects, they would be served by a variety of libraries.[58] Development of the Related Projects would likely generate additional demands upon library services, and would also pay development fees to support library services. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. Project impacts with regard to libraries would not be cumulatively considerable, and cumulative impacts would be less than significant. The conclusion would not be affected by the Revised Project.

5.12 Transportation

[58] LAPL Locations: http://www.lapl.org/branches

Development of the Project in conjunction with the Related Projects would result in an increase in average daily vehicle trips and peak hour vehicle trips. The methodology for traffic analysis included both an individual project level analysis (existing With Project scenario) and a cumulative impact analysis (Future with Project scenario). This cumulative future includes the Related Projects. The future with Project analysis shows that there would be a less than significant impact to study intersections. In addition, the VMT analysis shows a less than significant impact with TDM strategies. Thus, the Project's impacts would not be cumulatively considerable, and cumulative traffic impact of successive projects of the same type in the same place over time would not be significant.

5.13 Utilities and Service Systems

Development of the Project, in conjunction with cumulative growth throughout the City (including the Related Projects), would further increase the generation of wastewater, demand for potable water within the City, and increase regional demands on landfill capacity. Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2015 UWMP, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2040. Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant. In addition, some Related Projects could be subject to SB 610[59], which requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LARWQCB discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 275 mgd.[60] Thus, there is approximately 175 mgd available capacity.

As shown on **Table 5-1**, cumulative wastewater generation would be approximately 2.8 mgd. This is a smaller amount as compared to the 3.3 mgd analyzed in the Draft EIR, which is due to differences in various related projects' programs. The cumulative wastewater generation would be well within the design capacity of the HTP. Therefore, cumulative wastewater impacts would be less than significant.

Table 5-1
Estimated Cumulative Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Residential	14,419 units	110 gpd / unit	1,586,090
Commercial/Retail	1,419,695 sf	80 gpd / 1,000 sf	113,576
Restaurant	442,122 sf	300 gpd / 1,000 sf	132,637
Office	3,513,269 sf	120 gpd / 1,000 sf	421,592

59 https://water.ca.gov/LegacyFiles/pubs/use/sb_610_sb_221_guidebook/guidebook.pdf

60 https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl state=e9g2enwiy_5&_afrLoop=2223629005130851#!

Table 5-1
Estimated Cumulative Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Hotel	3,134 rooms	130 gpd / room	407,420
School	450 students	10 gpd / student	4,500
Health Club	99,239 sf	250 gpd / 1,000 sf	24,810
Studio	694,072 sf	80 gpd / 1,000 sf	55,526
		Related Projects Total	**2,746,151**
		Project Total	**74,200**
		Cumulative Total	**2,820,351**

sf = square feet gpd = gallons per day
Based on the June 2019 Traffic Study related projects list.
CAJA, 2020.

The 2015 UWMP was adopted in June 2016 and projects a demand of 611,800 AFY in 2020 and 644,700,000 AFY in 2025.[61] The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multi-family, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG 2012 RTP.[62] The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).[63] Neither the UWMP forecasts, nor the 2012 RTP include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. The UWMP demonstrates adequate capacity currently and future capacity to accommodate City growth into which the Project would easily fit.

The LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 mgd, with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season.

As shown on **Table 5-2**, cumulative water demand would be approximately 3.1 mgd. This is a smaller amount as compared to the 3.6 mgd analyzed in the Draft EIR, which is due to differences in various related projects' programs. The cumulative water demand would be well within the design capacity of the LAAFP. Therefore, cumulative water impacts would be less than significant.

61 2015 Urban Water Management Plan, Los Angeles, pg. ES-23.
62 2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.
63 SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

Table 5-2
Estimated Cumulative Water Demand

Land Use	Size	Water Demand Rates	Total (gpd)
Residential	14,419 units	110 gpd / unit	1,586,090
Commercial/Retail	1,419,695 sf	80 gpd / 1,000 sf	113,576
Restaurant	442,122 sf	300 gpd / 1,000 sf	132,637
Office	3,513,269 sf	120 gpd / 1,000 sf	421,592
Hotel	3,134 rooms	130 gpd / room	407,420
School	450 students	10 gpd / student	4,500
Health Club	99,239 sf	250 gpd / 1,000 sf	24,810
Studio	694,072 sf	80 gpd / 1,000 sf	55,526
Irrigation	-	10%	274,615
		Related Projects Total	**3,020,766**
		Project Total	**81,620**
		Cumulative Total	**3,102,386**

sf = square feet gpd = gallons per day
Based on the June 2019 Traffic Study related projects list.
Like the Project, the related projects includes 10% irrigation water factor.
CAJA, 2020.

In 2017, the City disposed of approximately 2.9 million tons of solid waste at the County's Class III landfills and approximately 23,810 tons at transformation facilities.[64] The 2.9 million tons of solid waste accounts for approximately 3.7 percent of the total remaining capacity (78.71 million tons) for the County's Class III landfills open to the City.[65]

As shown on **Table 5-3**, cumulative solid waste generation demand would be approximately 111.56 tpd (or 40,719 tons per year). This is a smaller amount as compared to the 135 tpd analyzed in the Draft EIR, which is due to differences in various related projects' programs. The cumulative solid waste generation would be approximately 1.4% of the 2.9 million tons that the City disposes of each year. Therefore, cumulative solid waste impacts would be less than significant.

Table 5-3
Estimated Cumulative Solid Waste Generation

Land Use	Size	Solid Waste Generation Rates	Total (tpd)
Residential	14,419 units	12.23 lbs / unit	88
Commercial/Retail	1,419,695 sf	6 lbs / 1,000 sf	4.2
Restaurant	442,122 sf	6 lbs / 1,000 sf	1.3
Office	3,513,269 sf	6 lbs / 1,000 sf	10.5
Hotel	3,134 rooms	2 lbs room	3
School	450 students	1 lb student	0.225
Health Club	99,239 sf	5 lbs / 1,000 sf	0.25
Studio	694,072 sf	5 lbs / 1,000 sf	1.7

64 These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City

65 2.9 million tons ÷ 78.71 million tons x 100% = 3.7 %.

Table 5-3
Estimated Cumulative Solid Waste Generation

Land Use	Size	Solid Waste Generation Rates	Total (tpd)
		Related Projects Total	**109**
		Project Total	**2.56**
		Cumulative Total	**111.56**

sf = square feet tpd = tons per day
Based on the June 2019 Traffic Study related projects list.
CAJA, 2020.

Ultimately, the wastewater and water facilities (HTP and LAAFP) and the Class III landfills County of Los Angeles have adequate capacity to accommodate the Project and Related Projects along with the general growth within the City. The Project's contribution to cumulative wastewater, water, and solid waste impacts will not be cumulatively considerable and cumulative impacts would be less than significant.

6 Alternatives Impact Analysis

6.1 Alternatives Considered But Rejected

In considering ways to substantially reduce or avoid the significant impacts identified for the Project, several alternatives were considered but rejected for further review, due to the infeasibility of the alternative and/or the inability of the alternative to substantially reduce or avoid the Project's significant impact after mitigation. These alternatives are discussed below.

6.1.1 Alternate Project Site

This alternative considered development of the Project on an alternate site within the Project site area. However, this alternative was rejected for further analysis, because the Project Applicant does not own or have control over any other developable property in the Project site area and cannot "reasonably acquire, control or otherwise have access to [an] alternative site" (refer to Section 15126.6[f][1] of the CEQA Guidelines). Thus, this alternative was deemed infeasible.

6.1.2 Access on Western Avenue Instead of Harold Way

The alternative assumes developing the Project as proposed, but with relocating the vehicle access point on Harold Way (at the northeastern corner of the Project site) as currently proposed to Western Avenue. The purpose of this alternative would be to attempt to redistribute Project traffic away from Harold Way to alleviate some of the traffic impact on Harold Way. However, this alternative was rejected for further review, because relocating the access point to Western Avenue would cause a physical division in the proposed grocery store square footage that would not allow for development of a mid-size grocery store to serve the existing and future residents in the Project area – an important basic objective of the Project. Also, relocating the access point from Harold Way to Western Avenue would not change the distribution of Project traffic coming from the west to the Project site (Hollywood Freeway east to Wilton Place, north to Harold Way, east to the Project access point at Harold Way and Western Avenue); a driveway on Western Avenue would not change the route that eastbound drivers likely would take to get to a driveway on Western Avenue. The Project's significant traffic impact on Harold Way is due to a function of the Project site's corner location relative to the Hollywood Freeway and the residential street to the north of the Project site. Accordingly, relocating the driveway would not substantially reduce or avoid the Project's significant unavoidable neighborhood intrusion impact on Harold Way. Additionally, Western Avenue along the Project site does not have a median lane for left-turn access into the Project site, which would be needed if the Harold Way access point were moved to Western Avenue. Since this would be the commercial-truck access point for the Project, the left-turn-lane median would need to be developed large enough to accommodate commercial trucks, which could not be accomplished without widening Western Avenue. Further, relocating the driveway to Western Avenue would conflict with LADOT's policy to locate driveway access on streets with the lowest traffic volumes, when available.

6.1.3 Reduced Project Size to Eliminate Significant Traffic Impact on Harold Way

This alternative assumes a smaller version of the Project with less traffic generation. The purpose of this alternative would be to eliminate the significant traffic impact on Harold Way. However, this alternative was rejected for further review, because the Project would have to be reduced by 70 percent to avoid the impact. Such a reduction would render the Project infeasible, because such a small development would not meet any of the basic Project Objectives and would be financially infeasible to build.

6.2 Selected Alternatives

The Draft EIR analyzed three alternatives:

- Alternative A: No Project (Continuation of Existing Project Site Conditions)
- Alternative B: No Density Bonus or Permit Adjustments
- Alternative C: Zoning Compliant Commercial/Office Development

Table 6-1 includes a comparison of the characteristics of the three alternatives analyzed in the EIR and the Revised Project addressed in this Addendum.

Table 6-1
Alternatives Comparison

Characteristics	Revised Project	Alt A: No Project	Alt B. No Density Bonus	Alt C: Zoning Compliant
Residential Dwelling Units (total) - Market Rate - Very Low Income households	412 du (total) 351 du 61 du	-	233 du (total) 233 du 0	-
Commercial Uses (total) - Grocery Store - Retail/Restaurant - Leasing Office	35,694 sf (total) 23,940 sf 10,564 sf 1,190 sf	26,457 sf	33,980 sf - 32,990 sf 990 sf	246,660 sf - 33,980 sf 212,680 sf
du = dwelling unit; sf = square feet				

The revisions to Appendix G were adopted largely to reduce redundancy, provide additional clarity and to align Appendix G with California appellate court and Supreme Court decisions and changes to the Public Resources Code. An overview of the modifications to the Appendix G is provided in Section 3.2 by environmental topic. Based on the discussion in Section 3.2, while Appendix G was modified, the modified Appendix G questions that would apply to the alternatives have been addressed within the Draft EIR, including within the Initial Study, provided as Appendix A1 of the Draft EIR.

6.3 Discussion of Environmentally Superior Alternative

6.3.1 As Compared to Approved Project

Alternative A (the No Project Alternative) would be environmentally superior to the Project, since this alternative would avoid all of the significant (but mitigatable) impacts, including Air Quality (Localized Construction Emissions and Sensitive Receptors), Noise (Construction), and Traffic (Intersection LOS), and the significant unavoidable neighborhood traffic intrusion impact that would occur under the Project. Also, Alternative A would not achieve any of the Project objectives. In accordance with CEQA Guidelines Section 15126.6(e), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Both Alternatives B and C include development of the Project site with land uses that are allowed "by right," based on the existing zoning and land use designation for the Project site, without the request for any discretionary approvals (such as a Density Bonus and associated increase in FAR and Project Permit Adjustments).

Alternative B would result in an overall reduction in the amount of operational pollutant emissions, demand for public services, daily and peak-hour traffic trips, generation of wastewater and solid waste, and consumption of water and energy, when compared to the Project, given the reduction in the number of dwelling units that would occur under the alternative. Alternative C would generate more operational pollutant emissions, daily and peak-hour traffic, wastewater, and would consume more water, electricity, and natural gas when compared to the Project, although Alternative C would generate less solid waste. Alternative B would result in the same significant (but mitigatable) impact on library services as the Project. This impact would not occur under Alternative C.

The significant (but mitigatable) construction-related air quality and noise impacts identified for the Project also would occur under both Alternatives B and C. This is due to the existing air quality conditions in the Project area/region and the proximity of the Project site to sensitive receptors, and nearly any development of the Project site would result in these significant construction-related air quality and noise impacts. For these reasons, neither Alternatives B nor C would substantially reduce the significant (but mitigatable) construction-related air quality and noise impacts that would occur under the Project.

Additionally, Alternative B would generate less daily and peak-hour traffic than the Project and would contribute less traffic to Harold Way. Alternative B would reduce the neighborhood intrusion impact on Harold Way, when compared to the Project. However, Alternative B's distribution of traffic on Harold Way would exceed the neighborhood intrusion threshold, and the significant unavoidable neighborhood intrusion impact identified for the Project also would occur under Alternative B. Alternative C would generate more daily and peak-hour traffic than the Project and would result in an increased significant and unavoidable neighborhood intrusion impact on Harold Way when compared to the Project. It is important to note that the significant unavoidable neighborhood intrusion impact that would occur under the Project and under Alternatives B and C is primarily a function of the existing traffic volumes, distribution, roadway infrastructure, and land use patterns in the Project area, and nearly any development of the Project site would result in a significant unavoidable neighborhood intrusion impact on Harold Way, including development that is substantially reduced when compared to the Project.

Alternative C would result in two significant (but mitigatable) intersection impacts under the Existing With Alternative C traffic condition that would not occur under the Project. Further, Alternative C would result in two additional significant intersection impacts under the Future With Alternative C traffic condition that would not occur under the Project. Implementation of Mitigation Measure K-1 (roadway improvements) and a TDM program demonstrating a 10 percent reduction in morning and afternoon peak-hour trips would be required to reduce the impacts to less than significant. It should be noted that if a 10 percent peak-hour traffic reduction could not be achieved, the Future With Alternative C intersection impacts would remain significant and unavoidable.

Since Alternative B would slightly lessen (although not below the significance level) the Project's significant unavoidable neighborhood intrusion impact, Alternative B is the Environmentally Superior Alternative.

6.3.2 As Compared to Revised Project

As shown in **Section 4** above, the Revised Project would incorporate all the Approved Project's mitigation measures, with modifications, to ensure regulatory compliance and show that the Project would comply with the LAMC noise ordinance. The alternatives would likewise comply with all regulatory compliance.

Alternative B and Alternative C would still require traffic intersection mitigation measures. Further, Alternative C would result in two additional significant intersection impacts under the Future With Alternative C traffic condition that would not occur under the Revised Project. Implementation of Mitigation Measure K-1 (roadway improvements) and a TDM program demonstrating a 10 percent reduction in morning and afternoon peak-hour trips would be required to reduce the impacts to less than significant. It should be noted that if a 10 percent peak-hour traffic reduction could not be achieved, the Future With Alternative C intersection impacts would remain significant and unavoidable. Therefore, Alternative B is the Environmentally Superior Alternative.

As compared to the Revised Project, Alternative B would have 179 fewer dwelling units and slightly less commercial square footage. Since Alternative B does not include a Density Bonus, no affordable units would be included as part of the alternative. Therefore, Alternative B would not achieve the Draft EIR's project objective to provide affordable housing in the Hollywood Community Plan area, or serve a range of potential renters.