CITY OF LOS ANGELES

DEPARTMENT OF CITY PLANNING

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Environmental Case No.: ENV-2015-3167-MND
Related Case No.: DIR-2015-3166-SPR
Project Title: Cahuenga Hotel Project

Council District No. 13

THIS DOCUMENT COMPRISES THE INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION ANALYSIS AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

Project Addresses: 1400, 1414 Cahuenga, 6407, 6414 De Longpre Avenue, 1403, 1405, 1408, 1413 Ivar Avenue, Los Angeles, CA 90028

Project Description: The Project Site is bounded by Cahuenga Boulevard to the west, De Longpre Avenue to the south, Ivar Avenue to the east, and a public alley to the north. The Site is located within the Hollywood Community Plan (HCP) in the City of Los Angles (City), The Project Site is approximately 20,207 square feet (or 0.464 acres). The Project Site contains a 2-story, approximately 10,659 square foot office building used for post-production office uses and surface parking. All existing buildings and uses would be removed. The Project would be a development with approximately 175 hotel rooms, approximately 5,043 square feet of restaurant space, and 600 square feet of retail space in a 7-story above-grade building, with two levels of subterranean parking. The Project will require approval of the following discretionary actions:

1. Site Plan Review, pursuant to LAMC Section 16.05 to permit the construction of a commercial project with more than 50,000 square feet of development and/or more than 50 guest rooms.

2. Any additional actions as may be deemed necessary or desirable, including but not limited to, demolition, grading, excavation, haul route, and building permits.

APPLICANT:
1400 Cahuenga Hotel, LLC

PREPARED FOR:
Los Angeles Department of City Planning

PREPARED BY:
CAJA Environmental Services, LLC

SIGNATURE (OFFICIAL)	DATE
Joshua T. D. Thurn	4-27-16

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APPENDICES

A Shade Study. Steinberg, October 2015.

B Air Quality, Greenhouse Gases, and Noise Appendices, DKA Planning, November 2015.

C-1 Archaeology Records Search, South Central Coastal Information Center, August 17, 2015.

C-2 Paleontology Records Search, Natural History Museum, August 11, 2015.

C-3 Sacred Lands File Search, Native American Heritage Commission, August 6, 2015.

D-1 Preliminary Geotechnical Engineering Investigation, GeoConcepts, Inc., December 17, 2014.

D-2 Soils Report Approval Letter, Los Angeles Department of Building and Safety, August 17, 2015.

E Phase I Environmental Site Assessment, Partner Inc., June 18, 2014.

F-1 Response from Los Angeles Police Department, October 15, 2015.

F-2 Response from Los Angeles Unified School District, August 18, 2015.

F-3 Response from Los Angeles Public Library, November 3, 2015.

G-1 Traffic Impact Analysis for Tommie Hotel, Overland Traffic Consultants, Inc., January 2016.

G-2 LADOT Approval Letter, From Los Angeles Department of Transportation to Los Angeles Department of City Planning, received on January 26, 2016.

H-1 Response from Los Angeles Bureau of Sanitation, September 3, 2015.

H-2 Response from Los Angeles Department of Water and Power, December 16, 2015.

H-3 Response from Southern California Gas Company, July 20, 2015.

CITY OF LOS ANGELES

CALIFORNINA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Greenhouse Gases	☐ Population and Housing
☐ Agriculture and Forestry Resources	☒ **Hazards and Hazardous Materials**	☒ **Public Services**
☐ Air Quality	☒ **Hydrology and Water Quality**	☐ Recreation
☐ Biological Resources	☐ Land Use and Planning	☒ **Transportation and Traffic**
☐ Cultural Resources	☐ Mineral Resources	☒ **Utilities and Service Systems**
☒ **Geology and Soils**	☒ **Noise**	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	**Date**

Printed Name

Jojo Pewsawang, City Planner

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

BACKGROUND

PROPONENT NAME	**PHONE NUMBER**
1400 Cahuenga Hotel, LLC	*(323) 466-1400*
PROPONENT ADDRESS	
1605 Cahuenga Boulevard, Los Angeles, CA, 90028	
AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
City of Los Angeles Department of City Planning	*March 2016*
PROPOSAL NAME (If Applicable)	
Cahuenga Hotel Project	

ENVIRONMENTAL IMPACTS (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	**AESTHETICS.** Would the project:				
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a scenic highway?	☐	☐	☒	☐
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
2.	**AGRICULTURE AND FORESTRY RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project, and the Forest Legacy Assessment project, and forest carbon measurement mythology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b.	Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
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 section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104	☐	☐	☐	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	(g))?				
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒
3.	**AIR QUALITY.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e.	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
4.	**BIOLOGICAL RESOURCES.** Would the project:				
a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local or regional plans, policies, regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife	☐	☐	☐	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	Service?				
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☐		☒
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?	☐	☐	☐	☒
5.	**CULTURAL RESOURCES:** Would the project:				
a.	Cause a substantial adverse change in significance of a historical resource as defined in *State CEQA Guidelines* §15064.5?	☐	☐	☐	☒
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to *State CEQA Guidelines* §15064.5?	☐	☐	☒	☐
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d.	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
6.	**GEOLOGY AND SOILS.** Would the project:				
a.	Expose people or structures to potential substantial adverse effects, including the risk of 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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
ii.	Strong seismic ground shaking?	☐	☐	☒	☐
iii.	Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv.	Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☒	☐	☐
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
7.	**GREENHOUSE GAS EMISSIONS.** Would the project:				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b.	Conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
8.	**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?	☐	☐	☒	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
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 for people residing or working in the project area?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
9.	**HYDROLOGY AND WATER QUALITY.** Would the proposal result in:				
a.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☐	☒
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☒	☐	☐
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	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?	☐	☐	☒	☐
f.	Otherwise substantially degrade water quality?	☐	☐	☒	☐
g.	Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h.	Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j.	Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐
10.	**LAND USE AND PLANNING.** Would the project:				
a.	Physically divide an established community?	☐	☐	☐	☒
b.	Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
11.	**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?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
12.	**NOISE.** Would the project:				
a.	Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b.	Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c.	Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d.	Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
13.	**POPULATION AND HOUSING.** Would the project:				
a.	Induce substantial 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)?	☐	☐	☒	☐
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
14.	**PUBLIC SERVICES.**				
a.	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				

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i.	Fire protection?	☐	☒	☐	☐
ii.	Police protection?	☐	☒	☐	☐
iii.	Schools?	☐	☐	☒	☐
iv.	Parks?	☐	☐	☒	☐
v.	Other public facilities?	☐	☐	☐	☒
15.	**RECREATION.**				
a.	Would the project 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?	☐	☐	☒	☐
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
16.	**TRANSPORTATION AND TRAFFIC.** Would the project:				
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☒	☐	☐
b.	Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results	☐	☐	☐	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	in substantial safety risks?				
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
e.	Result in inadequate emergency access?	☐	☐	☒	☐
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐
17.	**UTILITIES AND SERVICE SYSTEMS.** Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☒	☐	☐
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e.	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?	☐	☐	☒	☐
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
18. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to 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, 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?	☐	☐	☒	☐
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☐	☒	☐
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	❑	❑	☒	❑

☞ **DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)**

PREPARED BY	TITLE	TELEPHONE #	DATE
Jojo Pewsawang	City Planner	(213) 978-1214	

2. PROJECT DESCRIPTION

Introduction

Project Title:	Cahuenga Hotel Project
Case Numbers:	ENV-2015-3167-EAF DIR-2015-3166-SPR
Project Location:	1400, 1414 Cahuenga, 6407, 6414 De Longpre Avenue, 1403, 1405, 1408, 1413 Ivar Avenue, Los Angeles, CA 90028
Lead Agency:	City of Los Angeles Department of City Planning 200 N. Spring Street, Room 721, Los Angeles, CA 90012
City Staff Contact:	Jojo Pewsawang, City Planner jojo.pewsawang@lacity.org 213-978-1214
Applicant:	1400 Cahuenga Hotel, LLC 1605 Cahuenga Boulevard, Los Angeles, CA 90028

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) under the California Environmental Quality Act (CEQA) is the proposed Cahuenga Hotel Project (the Project), which consists of a new hotel development.

CEQA Statutes and Guidelines

According to CEQA Statute § 21064.5:

MITIGATED NEGATIVE DECLARATION

"Mitigated negative declaration" means a negative declaration prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

According to CEQA Guidelines Article 6. Negative Declaration Process

15070. DECISION TO PREPARE A NEGATIVE OR MITIGATED NEGATIVE DECLARATION

A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

15071. CONTENTS

A Negative Declaration circulated for public review shall include:

(a) A brief description of the project, including a commonly used name for the project, if any;

(b) The location of the project, preferably shown on a map, and the name of the project proponent;

(c) A proposed finding that the project will not have a significant effect on the environment;

(d) An attached copy of the Initial Study documenting reasons to support the finding; and

(e) Mitigation measures, if any, included in the project to avoid potentially significant effects.

Project Location

The Project Site is bounded by Cahuenga Boulevard to the west, De Longpre Avenue to the south, Ivar Avenue to the east, and a public alley to the north. See Figure 2-1, Vicinity Map, for the location within the context of the greater Los Angeles area. See Figure 2-2, Aerial Map, for the Project Site.

Regional Setting

The Site is located within the Hollywood Community Plan (HCP) in the City of Los Angles (City), approximately six miles northwest of Downtown Los Angeles. The HCP is a mosaic of districts, including the historic entertainment district on Hollywood Boulevard, the Media District south of Santa Monica Boulevard, the major medical facility cluster in East Hollywood, and many distinctive residential neighborhoods throughout. The HCP covers 25 square miles, extending roughly south of the Cities of

Burbank and Glendale and the Ventura Freeway, west of the Golden State Freeway, north of Melrose Avenue and east of Mulholland Drive and the Cities of West Hollywood and Beverly Hills, including a strip of land south of the City of West Hollywood and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue. Adjoining community plan areas include Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass to the north, Bel Air-Beverly Crest to the west, Wilshire to the south, and Silver Lake-Echo Park and northeast Los Angeles to the east.

Regional and Local Access

Regional access is provided by the Hollywood Freeway (US-101) located approximately 4,000 feet north and 4,300 feet west of the Project Site. In the Project Site's vicinity US-101 has access on Cahuenga Boulevard, Sunset Boulevard, and Hollywood Boulevard. Local access is provided by Cahuenga Boulevard, Ivar Avenue, and Sunset Boulevard.

Public Transit

The Los Angeles County Metropolitan Transportation Authority (Metro) provides bus service via Metro bus lines 2 and 210. There is service on Vine Street (Metro line 210) and Sunset Boulevard (Metro line 2/302). The Metro Red Line provides rail service to Downtown Los Angeles, Koreatown, Hollywood, and North Hollywood. The Site is approximately 2,000 feet southwest of the Hollywood/Vine Station. Los Angeles Department of Transportation (LADOT) provides bus service via the DASH Hollywood and Beachwood Canyon lines at the corner of Sunset and Vine Street.[1]

Site Information

The Project Site is approximately 20,207 square feet (or 0.464 acres).[2] The Site information is listed in Table 2-1, Project Site.

Table 2-1
Project Site

Address	APN	Zone	General Plan Land Use	Size (sf)
1400, 1414 Cahuenga Boulevard 6413 De Longpre Avenue	5546-014-052	C4-2D	Regional Center Commercial	6,188.9
6407 De Longpre Avenue				7,080.0
1403, 1405, 1408, 1413 Ivar Avenue				4,964.0

[1] *LADOT, DASH Hollywood: http://www.ladottransit.com/dash/routes/hollywood/hollywood.php*

[2] *20,207 square feet (prior to dedications) per Rockwell Group architects, August 26, 2015*

None				1,974.6
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org, July 2015.				

Zoning Information

The Project Site is zoned C4-2D (Commercial Zone, Height District 2), and General Plan land use designation for the Site is Regional Center Commercial. Additional zoning information (ZI) includes:

- ZI-2433 Revised Hollywood Injunction
- ZI-2374 Los Angeles State Enterprise Zone
- ZI-1352 Hollywood Redevelopment Project
- ZI-2277 Hollywood Redevelopment Project

Until recently, the Project Site was subject to the Hollywood Community Plan Update (HCP Update), which was adopted by City Council on June 19, 2012 (and its associated zoning ordinance as Ordinance No. 182,173).[3] On February 11, 2014 the Superior Court ordered a preemptory writ of mandate that the City take the necessary steps to rescind, vacate, and set aside all actions approving the HCP Update, the certified EIR and any and all actions that derive from the HCP Update. The court also enjoined the City from granting any authority, permits or entitlements that derive from the HCP Update or the EIR. On April 2, 2014, the City Council adopted a resolution to rescind the HCP Update and adopted Ordinance No. 182,960 to repeal the associated zoning ordinance all to comply with the court's order.[4] Therefore, the HCP Update and the associated zoning ordinance has been repealed, rescinded and invalidated. By operation of law, the 1988 Community Plan (See City Council action CF 12-0303 S4), in conjunction with the applicable provisions of the Los Angeles Municipal Code (LAMC) guide the land use and zoning on the Project Site, respectively.

Existing Uses

The Project Site contains a 2-story, approximately 10,659 square foot office building[5] used for post-production office uses and surface parking. All existing buildings and uses would be removed. The existing Site and surrounding uses are shown in Figure 2-3, Site Context.

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[3] *Hollywood Community Plan Update: http://cityplanning.lacity.org/complan/pdf/HwdCpTxt.pdf*

[4] *LA City Clerk: http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=12-0303-S4*

[5] *ZIMAS assessor information for 1400 Cahuenga categorizing building Use Code as 1700- Office Building.*

Surrounding Uses

The Project Site is surrounded by the following uses:

- North: Surface parking lot and restaurant/lounge (zoned C4-2D) north of the alley.
- South: Auto body shop (zoned C4-2D) south of De Longpre Avenue.
- Southwest: Los Angeles Fire Department (LAFD) Station 27 (along Cole Avenue) and Los Angeles Police Department (LAPD) Hollywood Station (along Wilcox Avenue) (zoned PF-1XL).
- Southeast: Commercial uses and surface parking (zoned C4-2D-SN) south of De Longpre Avenue and east of Ivar Avenue.
- West: Office/production use (zoned C4-2D) west of Cahuenga Boulevard.
- East: 7-level parking structure and Cinerama Dome commercial center (zoned C4-2D-SN) east of Ivar Avenue.

The nearest residential uses are approximately 530 feet west on De Longpre and Wilcox Avenue. Additional residential uses are approximately 530 feet southwest on Fountain Avenue and Cole Avenue.

Proposed Project[6]

The Project would be a development with approximately 175 hotel rooms, approximately 5,043 square feet of restaurant space, and 600 square feet of retail space in a 7-story above-grade building, with two levels of subterranean parking. Plans, elevations, and perspective are shown in Figures 2-4 through 2-16.

Floor Area

The by-right floor-area-ratio (FAR) is 3:1. The proposed FAR is approximately 3.0:1.[7] The building would be approximately 60,621 square feet in floor area.[8]

Density

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[6] *Rockwell Group Architects, August 26, 2015.*

[7] *20,207 sf lot area x 3.0 FAR = 60,621 sf.*

[8] *Note See LAMC Section 12.03.- square footage calculation – The area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and basement storage areas.*

The allowable density is unlimited per LAMC Section 12.22.A.18.a and 12.12.C.4. The proposed density is 175 hotel rooms.

Amenities

The building will include standard guest amenities including a ground floor lobby, restaurant, and retail spaces. The amenities will include meeting rooms, fitness rooms, a bar/lounge, and a pool terrace.

Height

The allowable height is unlimited and there is no story limit. The proposed height is 86'-6" (Top of Roof) and 74'-7 1/4" (Top of Amenities).

Landscaping

The Site currently contains no landscaping or trees. There will be landscaping around the Site at the ground floor, in a central courtyard, and on the rooftop pool area.

Access

The Project proposes one two-way driveway (one exit and one entry) on Ivar Avenue. Valet drop-off would be along De Longpre Avenue. Pedestrian access to the hotel lobby would be accessed via De Longpre Avenue. Cahuenga Boulevard and De Longpre would also provide pedestrian access to the retail and restaurant spaces.

Parking

Table 2-2, Vehicle Parking Required, provides the amount of required parking by land use type and quantity. The Project is required to have 94 spaces, then 9 removed (per 10% bike reduction) for a total of 85 required spaces. The project proposes 106 parking stalls on site to meet this requirement. Some of the parking will be established through a mechanical parking lift on the second basement level.

Table 2-2
Vehicle Parking Required

Use	Amount	Rate	Total spaces
Hotel Parking			
1st – 30 Guest rooms	30 rooms	1 space / room	30
31 – 60 Guest Rooms	30 rooms	1 space / 2 rooms	15
61 – 175 Guest Rooms	115 rooms	1 space / 3 rooms	38
		Subtotal Hotel	**83**
Restaurant Parking			
Restaurant	5,043 sf	2 space / 1,000 sf	**10**
Retail Parking			
Retail	600 sf	2 space / 1,000 sf	**1**

Total	**94**

City of Los Angeles Municipal Code (Section 12.21.A4).
Enterprise Zones not in Downtown Parking District (DPD) (ZI 1643, ZI 1644, ZI 1645, ZI 1652, ZI1653) - commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development building need only provide 2 parking spaces for every 1000 sq. ft. of floor area. The Project is in the Los Angeles State Enterprise Zone.
Table by CAJA Environmental Services, November 2015.

Bicycles

Municipal Code Section 12.21.A.16(a)(2) requires new projects to provide bicycle parking spaces. A hotel is required to provide one short term bicycle space per 20 guest rooms and one long term bicycle space per 20 guest rooms. Commercial uses (restaurant and retail) require one short term and one long term bicycle space per 2,000 square feet of floor area. Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. Bicycle parking would be provided pursuant to the LAMC. As shown in Table 2-3, Bicycle Parking Required, the Project will provide, at a minimum, 13 short term and 13 long term bicycle spaces. However, by using a 10% bike reduction for vehicle parking, there is a need for an additional 36 bike spaces (9 cars x 4/stall). Thus, the 26 required spaces is increased by 36 for a total of 62 spaces (31 short-term and 31 long-term).

Table 2-3
Bicycle Parking Required

Use	Amount	Rate	Short-Term	Long-Term
Hotel	175 rooms	1 per 20 rooms (long term and short term)	9	9
Restaurant	5,043 sf	1 per 2,000 sf (long-term and short-term)	3	3
Retail	600 sf	1 per 2,000 sf (long-term and short-term)	1	1
		Total	**13**	**13**

Municipal Code Section 12.21.A.16(a)(2)
Table by CAJA Environmental Services, August 2015.

Green/Conservation Features

The Project would comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2013 California Green Building Standards Code (CalGreen).[9]

[9] *Los Angeles Department of Building and Safety: http://ladbs.org/LADBSWeb/green-bldg.jsf*

Construction Information

The estimated construction schedule is shown in Table 2-4, Construction Schedule. Operation would begin in 2018.[10] Demolition would remove approximately 10,659 square feet of the existing building. The amount of soils exported will be approximately 33,000 cubic yards.[11] The Project would be built with two subterranean levels of approximately 25 feet in depth.[12] Grading may also include depth required foundation footings and soil compaction.

Table 2-4
Construction Schedule

Phase	Duration	Schedule
Demolition	1 month	April 2, 2016 – May 2, 2016
Site Preparation	2 weeks	May 1, 2016 – May 15, 2016
Grading	4 months	May 16, 2016 – Sept 16, 2016
Construction	14 months	Sept 17, 2016 – Nov 17, 2017
Architectural Coating	4 months	Aug 17, 2017 – Dec 17, 2017

Construction schedule and timing are estimates only.
Source: Client provided, September 2015.
Table: CAJA Environmental Services, September 2015.

Haul Route

A Haul Route program will be required as part of the City's permitting process. It is anticipated that the limited demolition and construction debris would be transported to the Sunshine Canyon Landfill in Sylmar. The haul route is approximately 20 miles and would generally include:

- Local streets (Cahuenga Boulevard) to US-101 freeway to CA-170 freeway to I-5 freeway to Sepulveda Blvd to San Fernando Road to Sunshine Canyon Landfill. The haul route is illustrated in Figure 2-17.

Project Objectives

The objectives of the Project are as follows:

- Redevelop a currently underutilized site into a mixed-use development that combines hotel, retail, and restaurant uses.

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[10] *Traffic Impact Study, Overland Traffic, 2015.*

[11] *Client provided, November 2015.*

[12] *Preliminary Geotechnical Engineering Investigation, GeoConcepts, Inc., December 17, 2014.*

- Support infill development and redevelopment in existing urban areas to reduce "greenfield" development and urban sprawl.
- Respond to the pent up demand for new hotel rooms in the City of Los Angeles and specifically in the Hollywood sub-market, as identified in the Report of the Chief Legislative Analyst to the Members of the City's Housing, Community and Economic Development Committee dated August 6, 2013.[13]
- Provide a lodging option for leisure and business travelers, tourists and visiting friends/relatives of local residents with a hotel concept in Hollywood with proximity to some of the region's most popular tourist, cultural and entertainment destinations.
- Leverage the billions of public investment dollars on local transit facilities and infrastructure, including the Hollywood/Vine Metro station, which is located approximately 2,000 feet away.
- Construct an iconic, contemporary hotel project on Cahuenga Boulevard, near the Cinerama Dome commercial center.
- Improve the aesthetic quality and sustainability of the Project Site by removing an older, outdated structure and developing a modern, efficient building that utilizes the latest City and State Green Building Codes.
- Contribute to the economic recovery of the City by developing hotel uses that generate local tax revenues, provide new jobs, and host hotel guests who support local businesses, including dining, shopping and entertainment venues nearby.

Discretionary Actions

The City of Los Angeles (the City) is the Lead Agency for the Project. In order to construct the Project, the applicant is requesting approval of the following discretionary and ministerial actions from the City: [14]

1. Site Plan Review, pursuant to LAMC Section 16.05 to permit the construction of a commercial project with more than 50,000 square feet of development and/or more than 50 guest rooms.
2. Any additional actions as may be deemed necessary or desirable, including but not limited to, demolition, grading, excavation, haul route, and building permits.

Pursuant to various sections of the Los Angeles Municipal Code, the applicant would request approvals and permits from the Building and Safety Department (and other municipal agencies) for project

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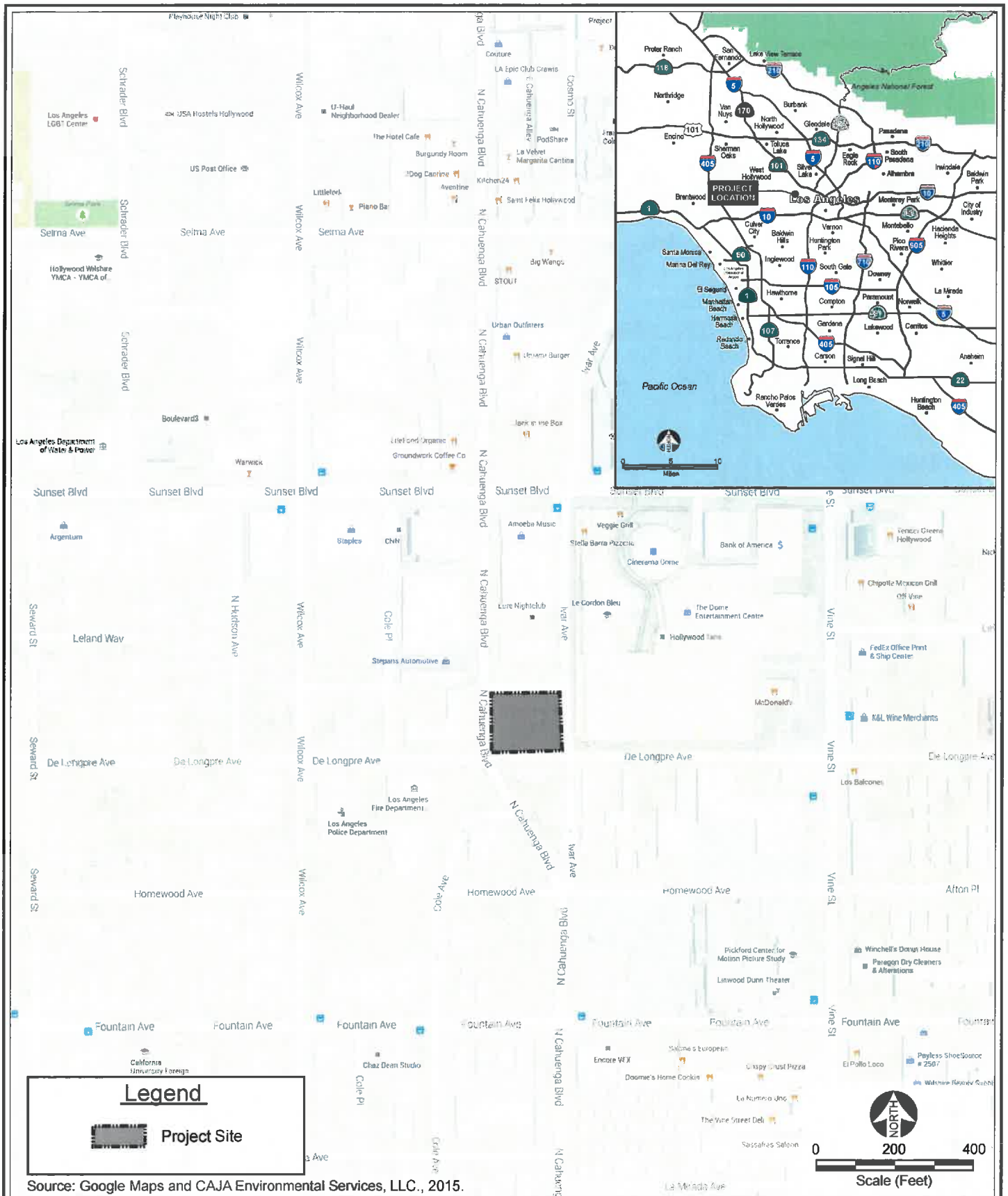
[13] *Report: http://clkrep.lacity.org/onlinedocs/2013/13-0991_rpt_cla_8-6-13.pdf*

[14] *Master Land Use Permit Application, October 2015.*

construction activities including, but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, building and tenant improvements. This IS/MND is intended to be the primary reference document in the formulation and implementation of a mitigation monitoring program for the Project. This IS/MND is also intended to cover all federal, State, regional and/or local government discretionary approvals that may be required to develop the Project, whether or not they are explicitly listed above. Agencies that may have jurisdiction over the Project include, but are not limited to:

- Regional Water Quality Control Board
- South Coast Air Quality Management District



CAJA Environmental Services, LLC

Figure 2-1
Vicinity Map

CAJA Environmental Services, LLC

Figure 2-2
Aerial Map

1. Adjacent building

2. Adjacent building

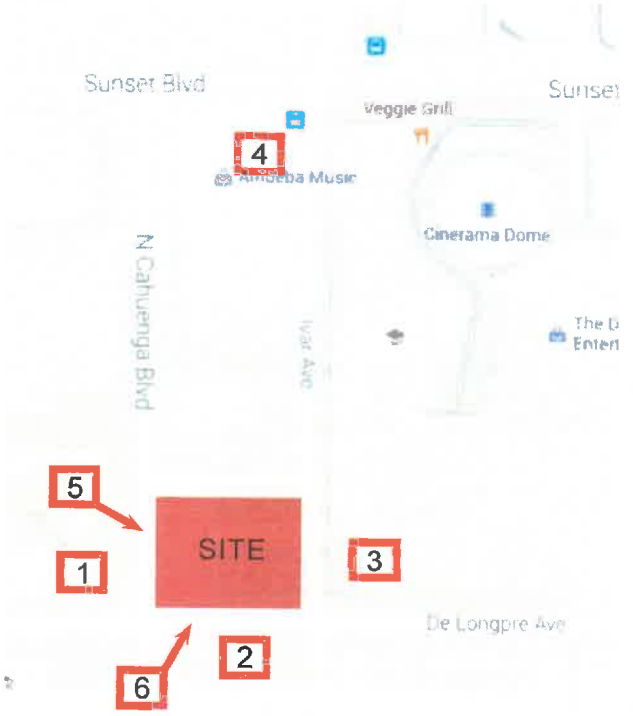
3. Adjacent building

4. Amoeba Music

5. Site: View from Cahuenga Blvd.

6. Site: View from DeLongpre Ave.

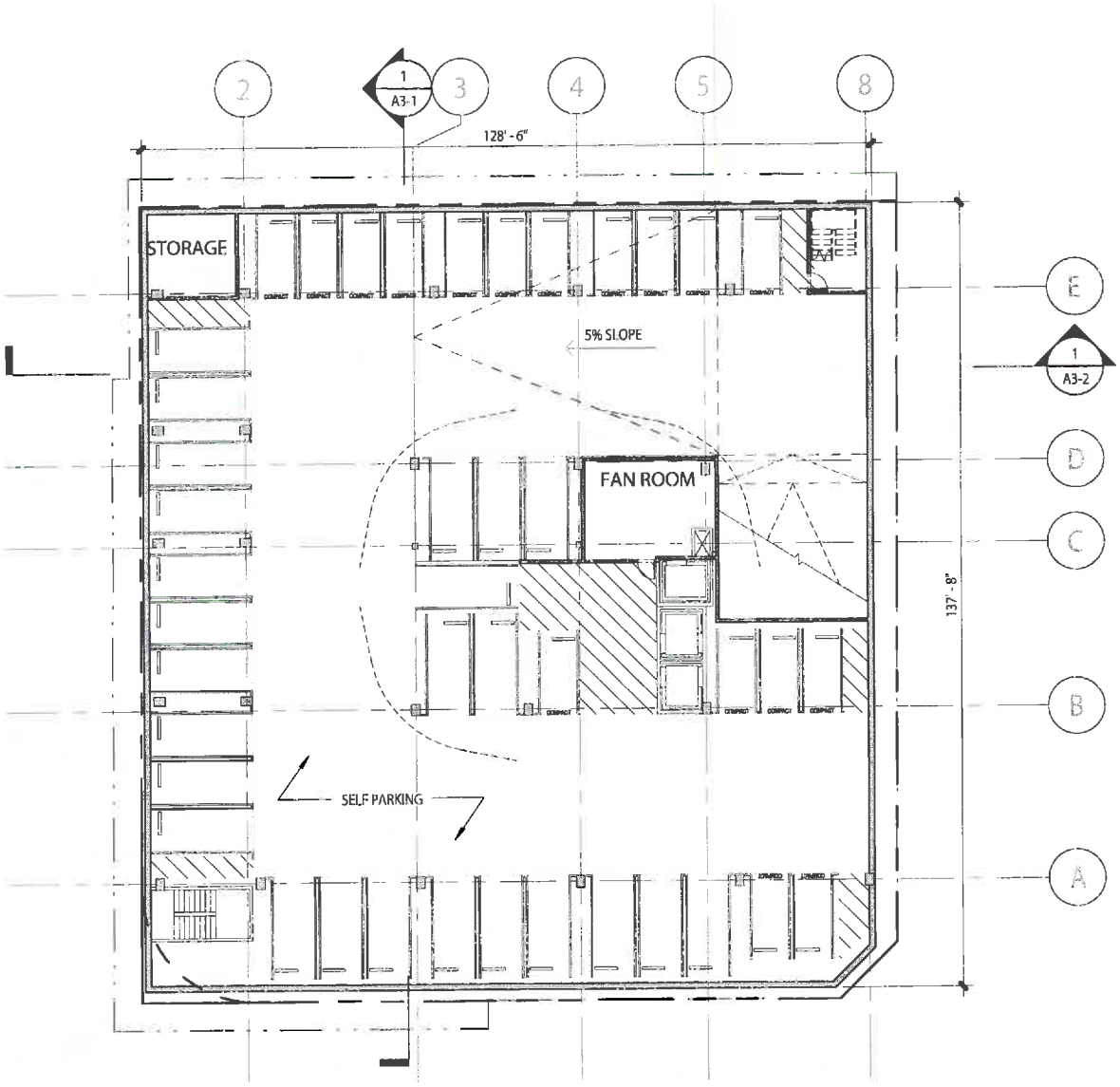
SITE MAP



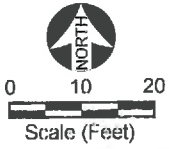
Source: Steinberg Architects, August 2015.

CAJA Environmental Services, LLC

Figure 2-3
Site Context



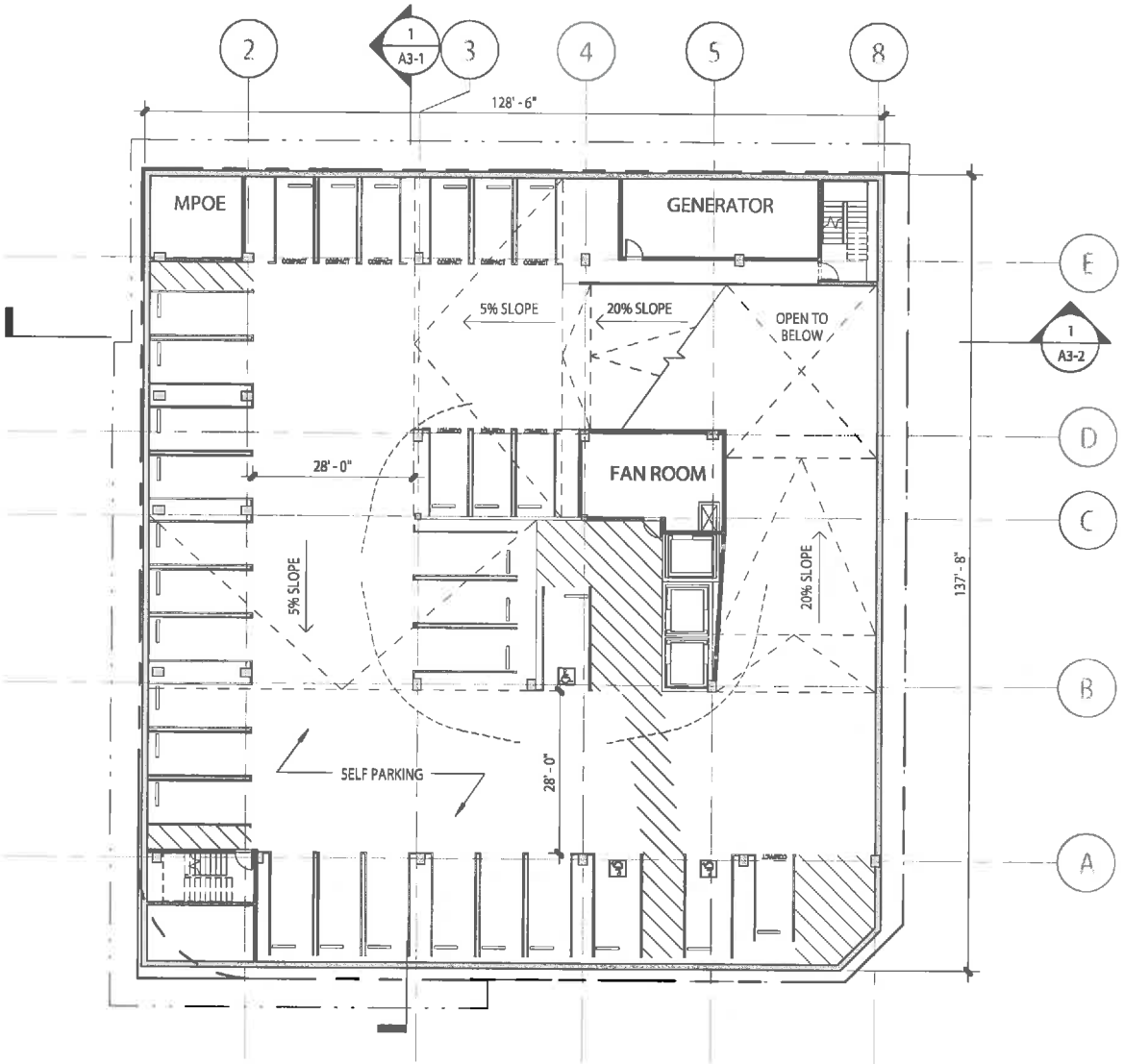
PARKING SCHEDULE - BY TYPE		
Family and Type	Count	Type Comments
Parking: Handicap 9'-0" x 18'-0"	2	ACCESSIBLE
ACCESSIBLE: 2		
Parking: Handicap -EV- 9'-0" x 18'-0"	1	ACCESSIBLE VAN
ACCESSIBLE VAN: 1		
Parking: Compact 7'-6" x 15'-0"	27	COMPACT
COMPACT: 27		
Parking: Standard 8'-4" x 18'-0"	44	STANDARD
STANDARD: 44		
TOTAL SPACES PROVIDED: 74		



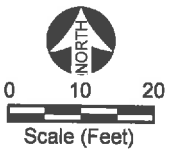
Source: Steinberg Architects, August 2015.

CAJA Environmental Services, LLC

Figure 2-4
Level P2 Parking Plan



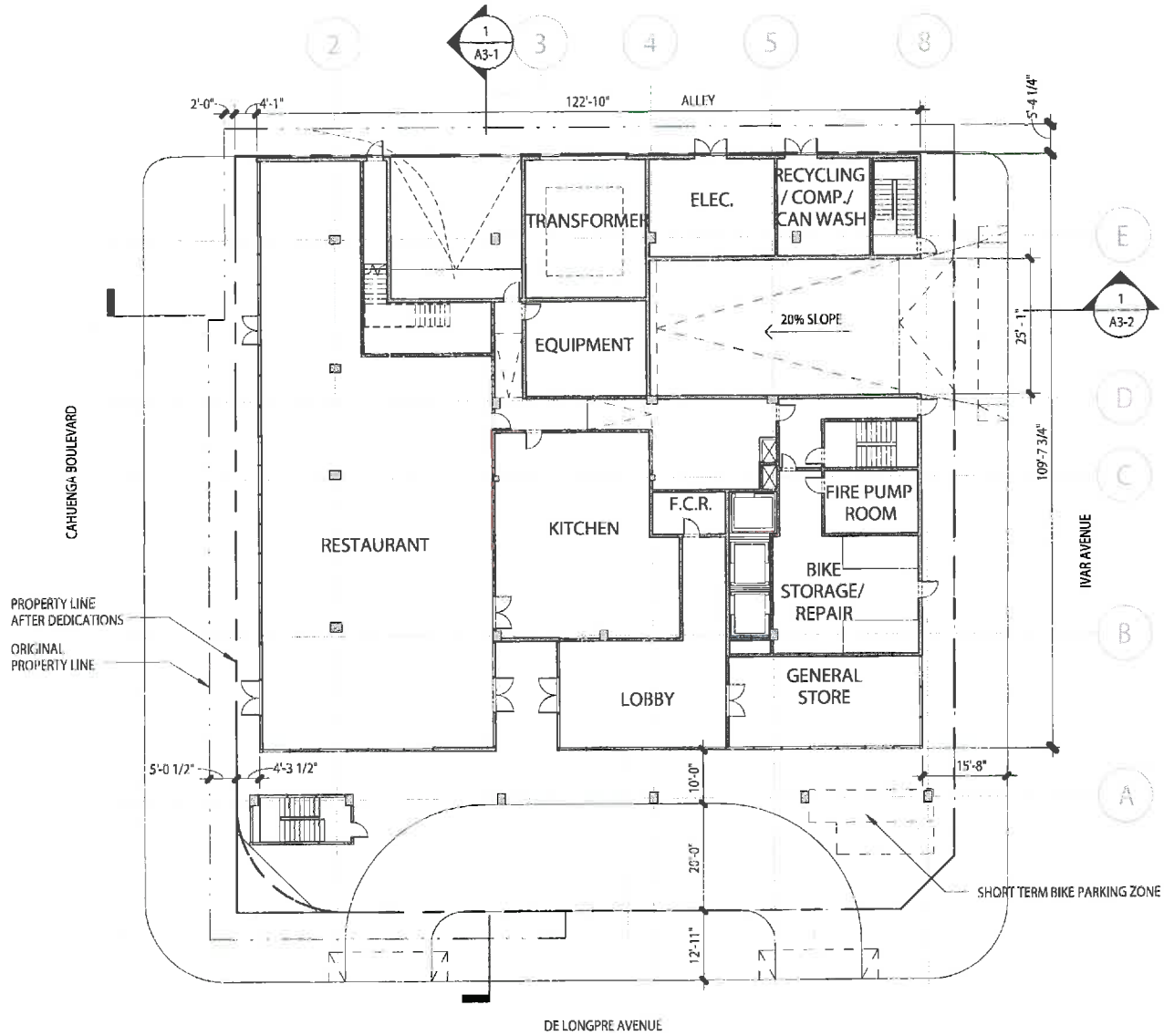
PARKING SCHEDULE - BY TYPE		
Family and Type	Count	Type Comments
Parking: Handicap 9'-0" x 18'-0"	2	ACCESSIBLE
ACCESSIBLE: 2		
Parking: Handicap -EV- 9'-0" x 18'-0"	1	ACCESSIBLE VAN
ACCESSIBLE VAN: 1		
Parking: Compact 7'-6" x 15'-0"	27	COMPACT
COMPACT: 27		
Parking: Standard 8'-4" x 18'-0"	44	STANDARD
STANDARD: 44		
TOTAL SPACES PROVIDED: 74		



Source: Steinberg Architects, August 2015.

CAJA Environmental Services, LLC

Figure 2-5
Level P1 Parking Plan



NORTH

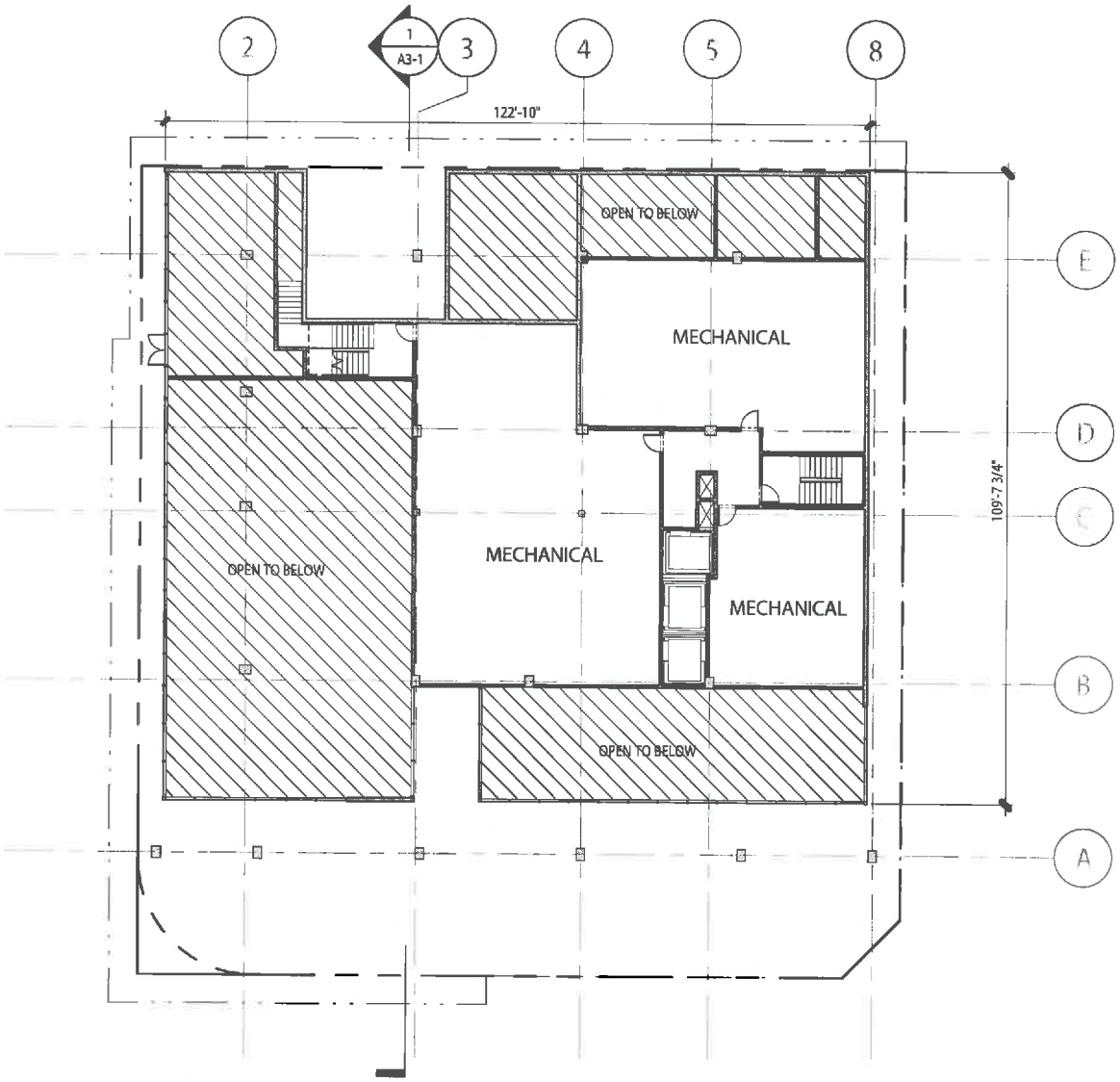
0 10 20

Scale (Feet)

Source: Steinberg Architects, August 2015.

CAJA Environmental Services, LLC

Figure 2-6
Level 1 Floor Plan



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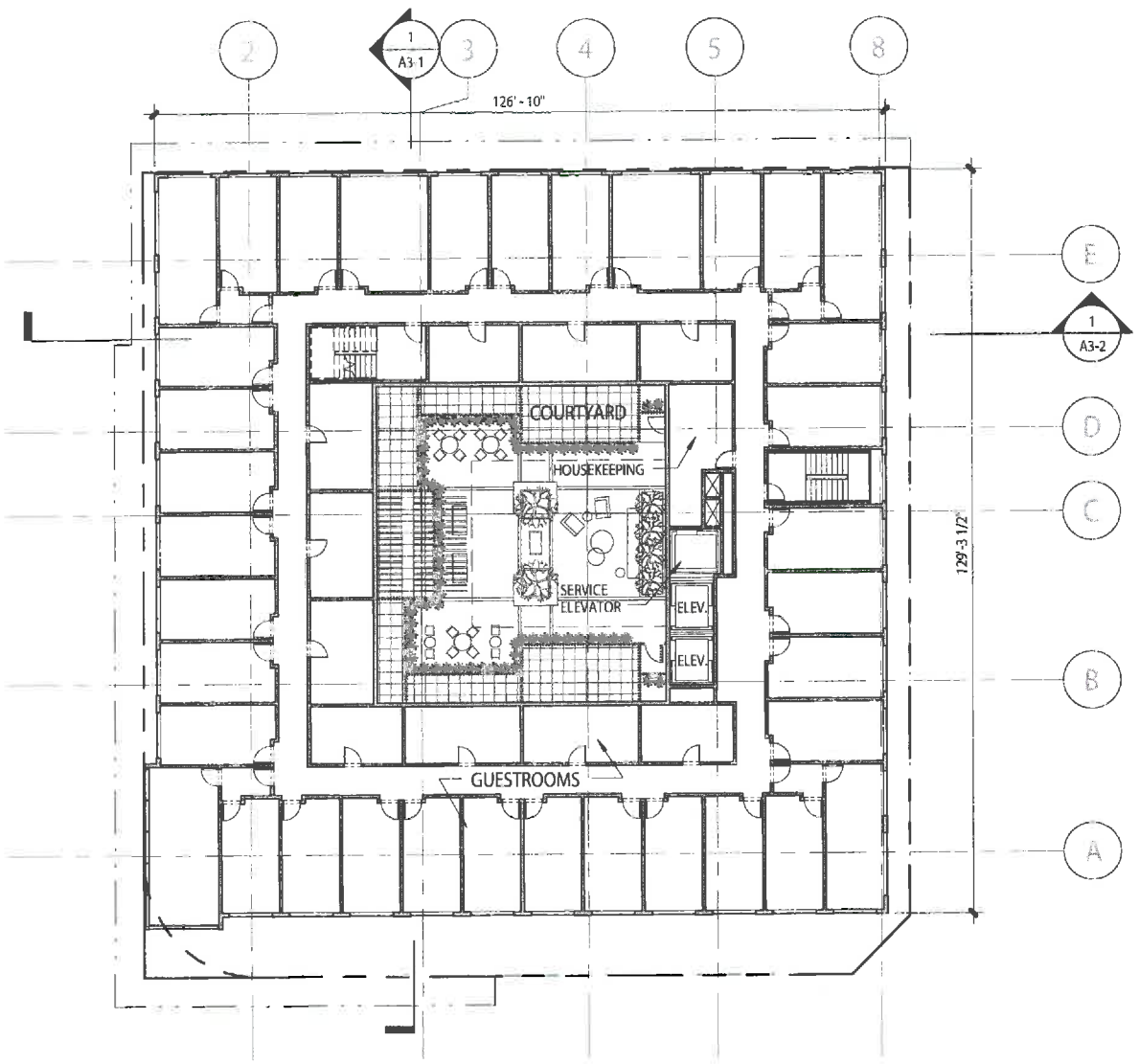
Scale (Feet)

Source: Steinberg Architects, August 2015.

CAJA Environmental Services, LLC

Figure 2-7
Level 2 Floor Plan



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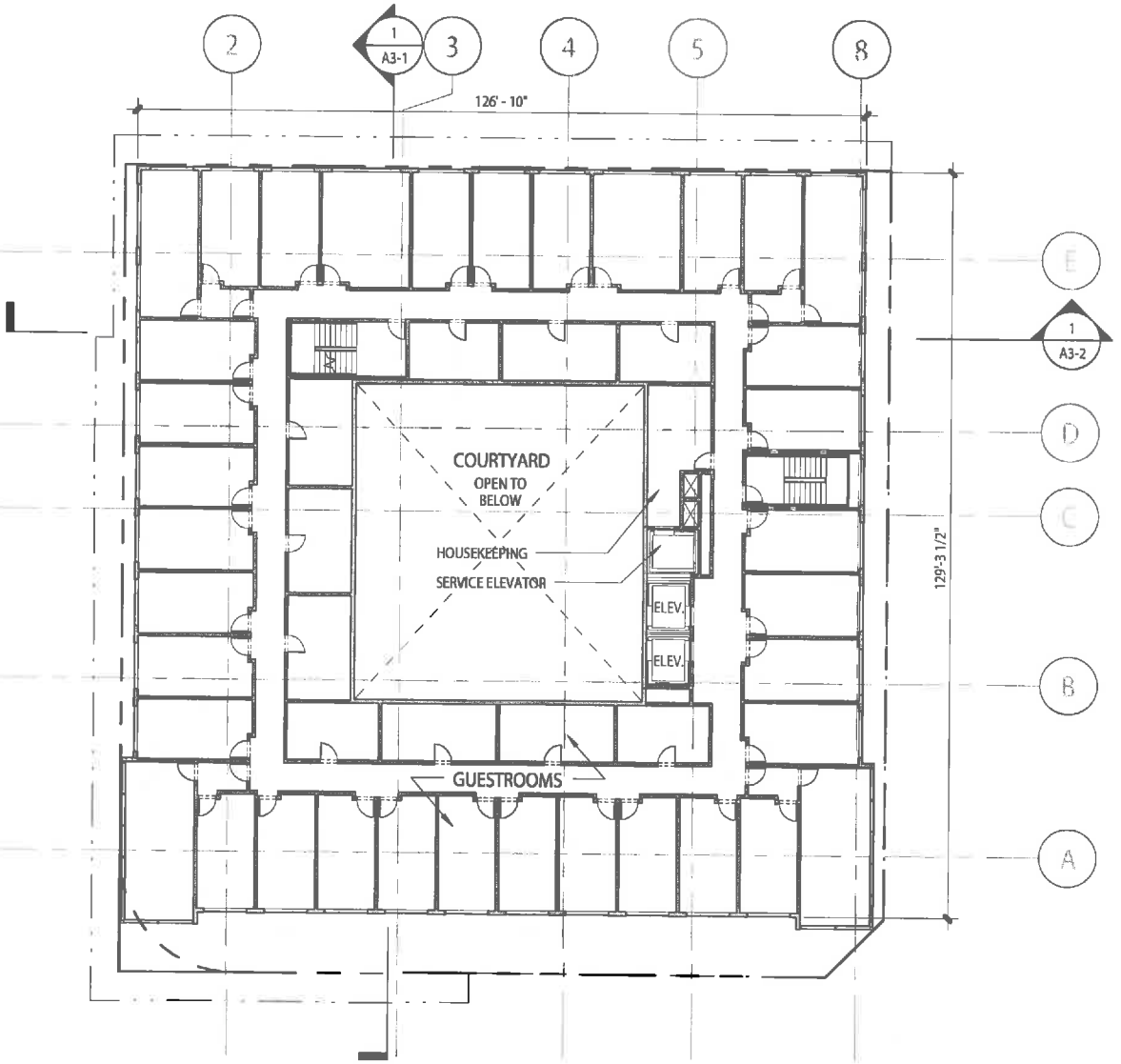
Scale (Feet)

Source: Steinberg Architects, August 2015.

CAJA Environmental Services, LLC

Figure 2-8
Level 3 Floor Plan



Source: Steinberg Architects, August 2015.

NORTH

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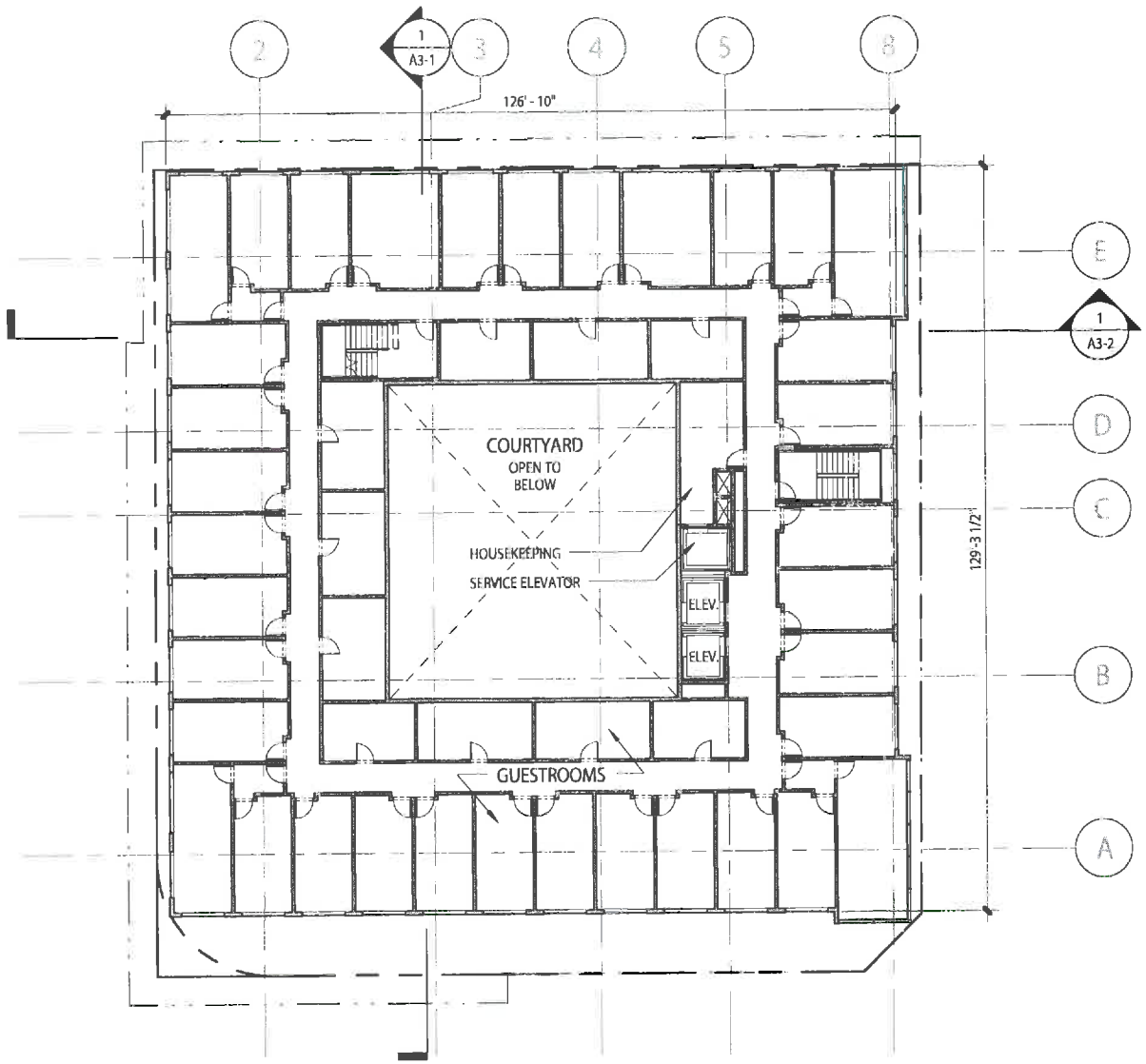
Scale (Feet)

CAJA Environmental Services, LLC

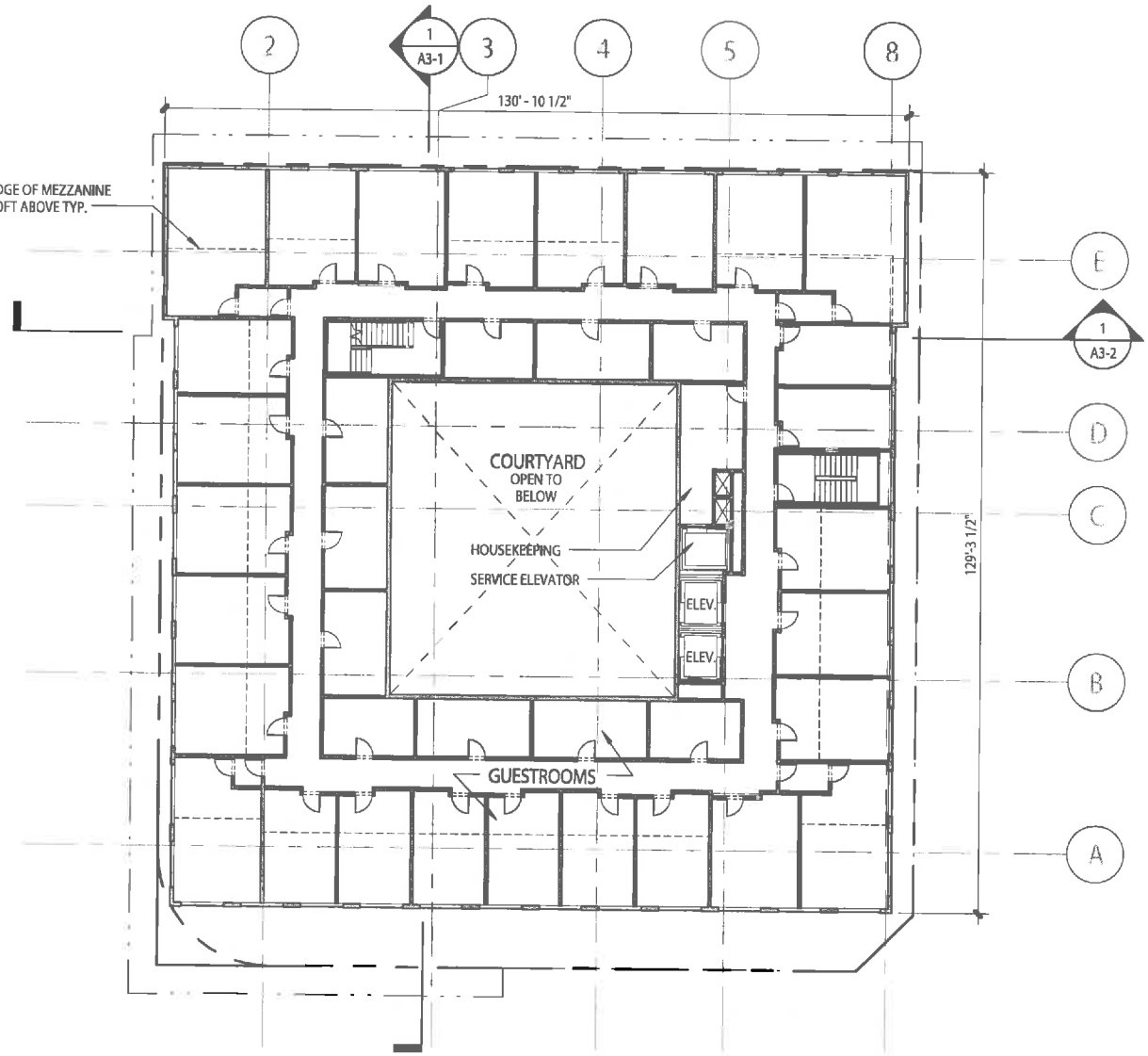
Figure 2-9
Level 4 Floor Plan



Source: Steinberg Architects, August 2015.

CAJA Environmental Services, LLC

Figure 2-10
Level 5 Floor Plan



Source: Steinberg Architects, August 2015.

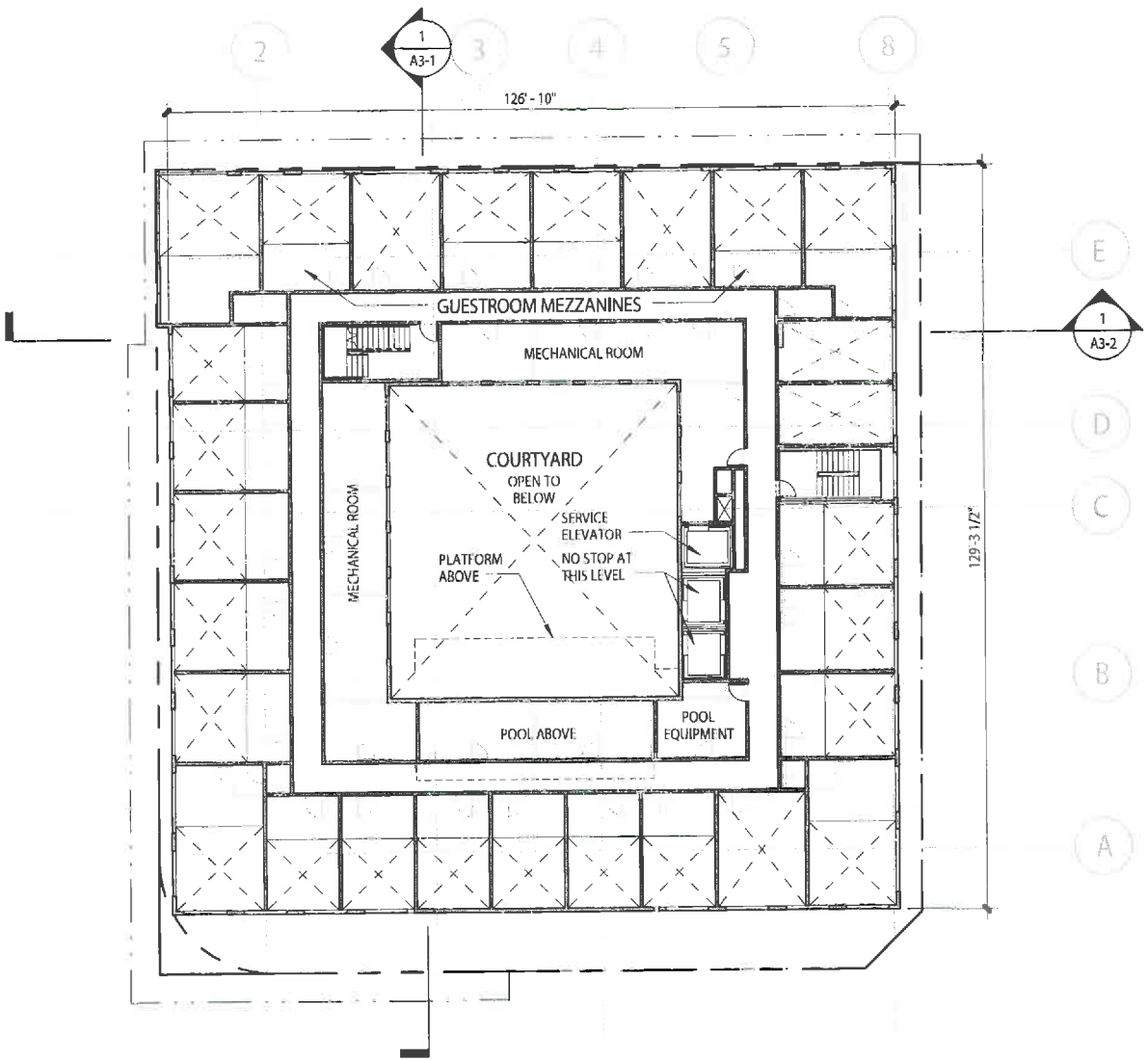
NORTH

0 10 20

Scale (Feet)

CAJA Environmental Services, LLC

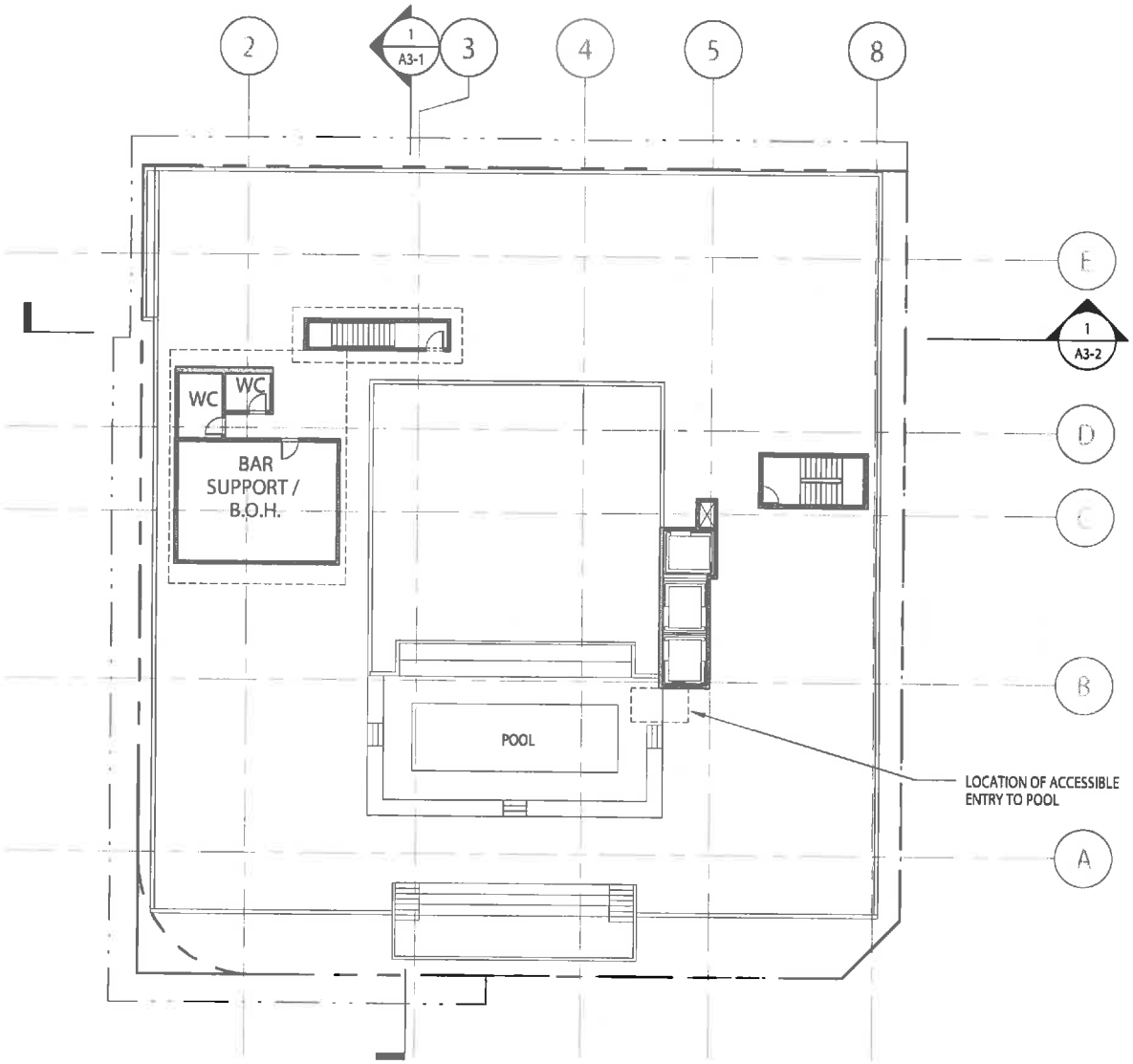
Figure 2-11
Level 6 Floor Plan



Source: Steinberg Architects, August 2015.

CAJA Environmental Services, LLC

Figure 2-12
Level 6 Mezzanine Floor Plan



Source: Steinberg Architects, August 2015.

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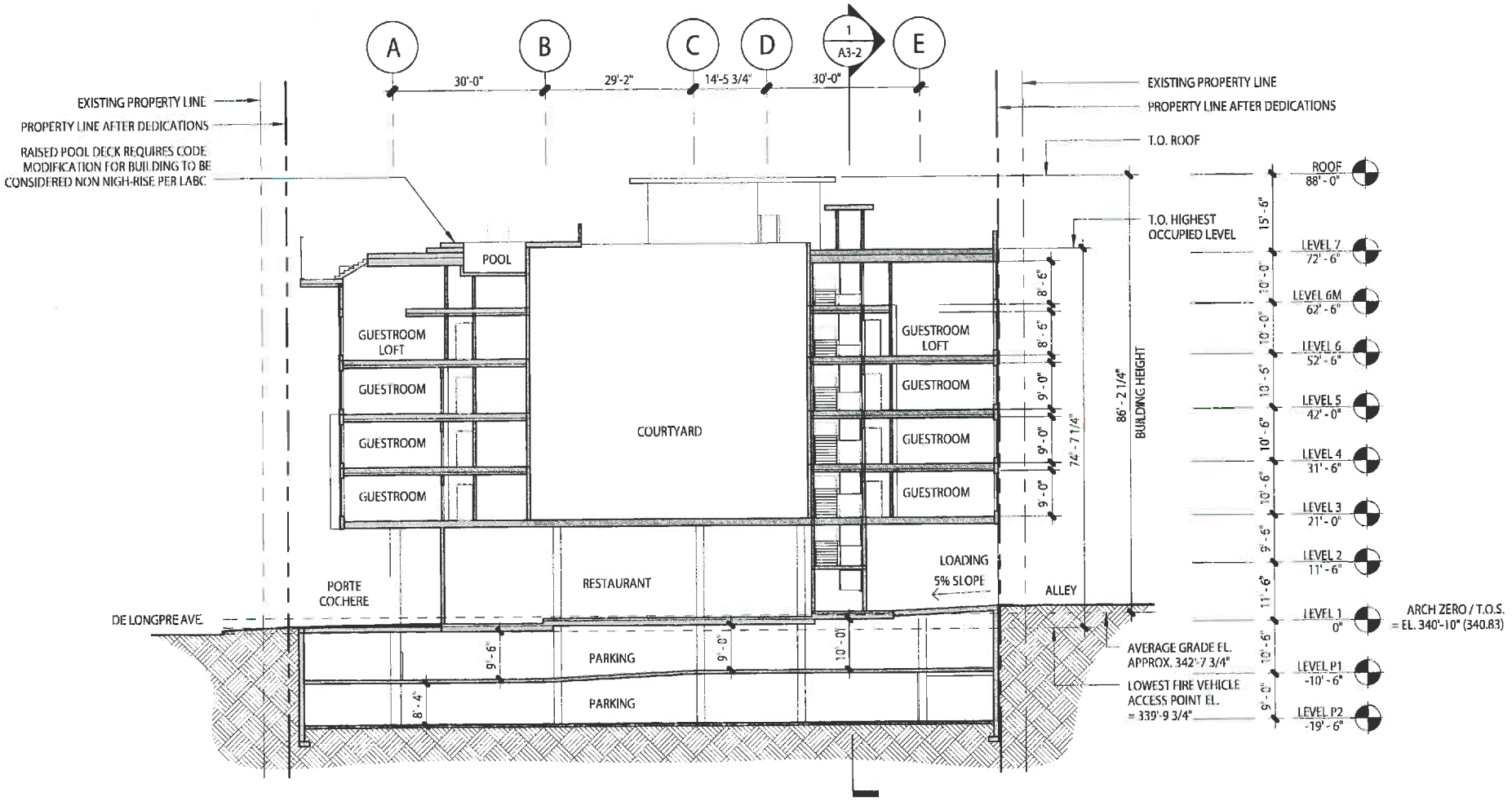
Scale (Feet)

CAJA Environmental Services, LLC

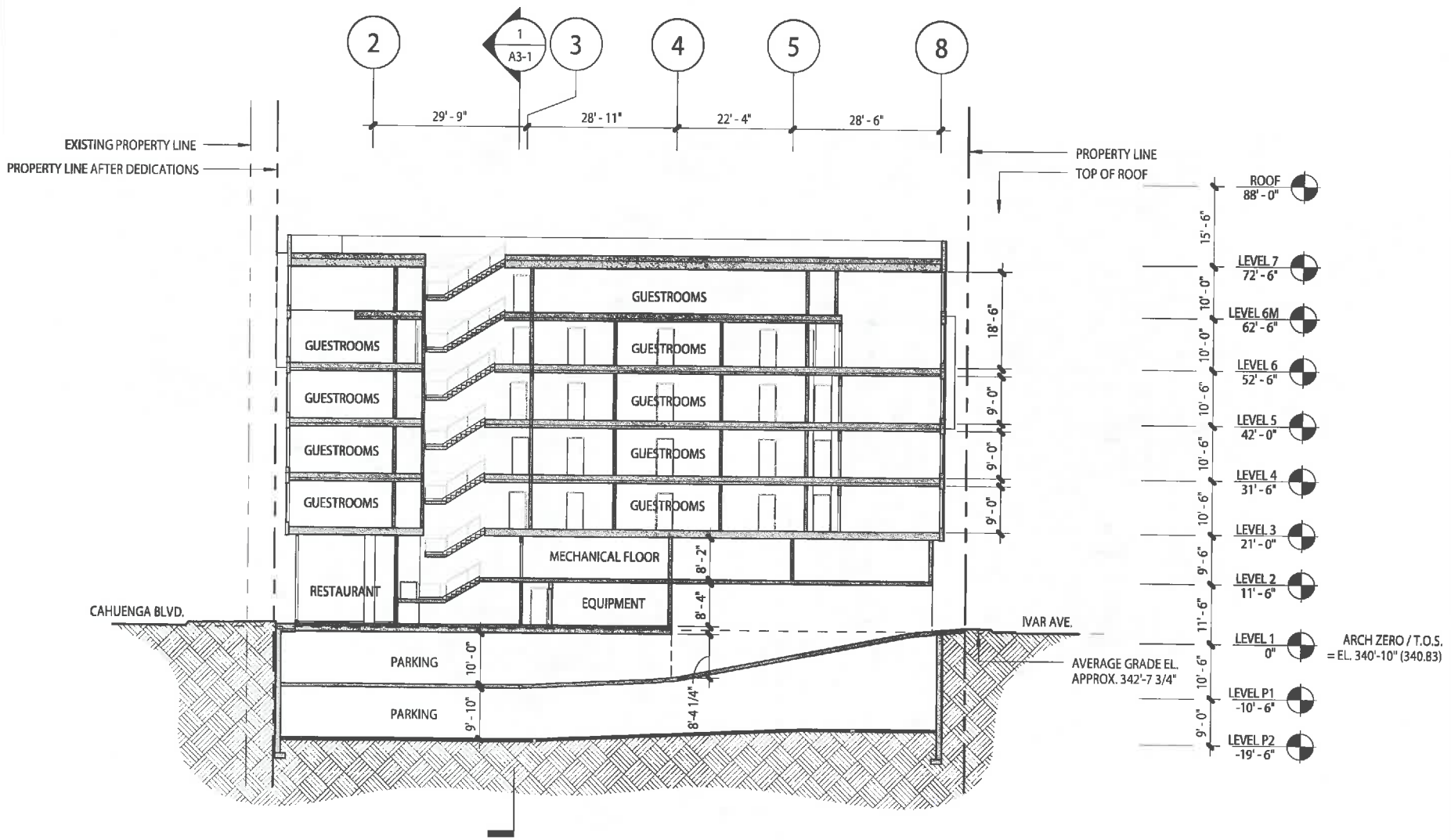
Figure 2-13
Level 7 Amenities



Source: Steinberg Architects, August 2015.

CAJA Environmental Services, LLC

Figure 2-14
Section North-South



Source: Steinberg Architects, August 2015.

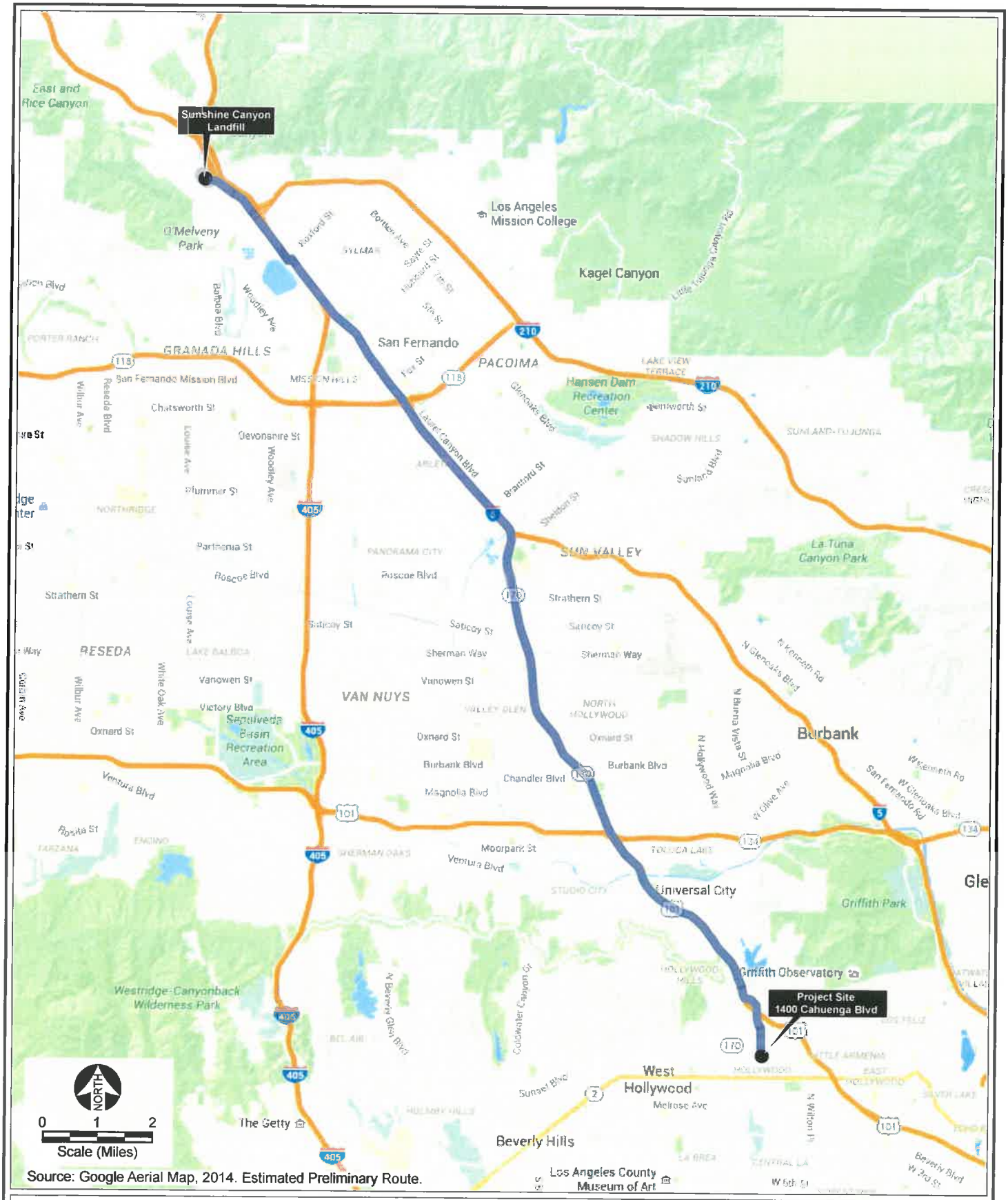
CAJA Environmental Services, LLC

Figure 2-15
Section East-West

Source: Steinberg Architects, August 2015.

CAJA Environmental Services, LLC

Figure 2-16
View from Southwest



Source: Google Aerial Map, 2014. Estimated Preliminary Route.

CAJA Environmental Services, LLC

Figure 2-17
Haul Route

3. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS

The section is based in part on the following item, included as Appendix A of this IS/MND:

A Shade Study, Steinberg, October 2015.

This analysis is provided herein for full disclosure so the public and decision-makers can consider and evaluate this potential impact, even though Senate Bill No. 743[1], effective as of January 1, 2014, amended CEQA in pertinent part to add Public Resources Code Section 21099 to provide that the aesthetics of a project that is an employment center project on an infill site within a transit priority area shall not be considered a significant impact under CEQA.[2] The Project is an employment center project, which is defined 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.[3] The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been previously developed.[4] The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit stop.[5] The Project Site is within 2,000 feet of Metro Red Line Hollywood/Vine Station.

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. The Site is located in the Hollywood Community Plan (HCP) in the City of Los Angeles (City), approximately 5.5 miles northwest of Downtown Los Angeles and 11 miles east (inland) from the Pacific Ocean. The Community Plan covers 25 square miles, extending roughly south of Mulholland Drive and the Cities of Burbank and Glendale and the Ventura Freeway; west of the Golden State Freeway; north of Melrose Avenue and east of the Cities of West Hollywood and Beverly Hills, including a strip of land south of the City of West Hollywood and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue. Adjoining community plan areas include Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass to the north, Bel Air-Beverly Crest to the west, Wilshire to the south, and Silver Lake-Echo Park and Northeast Los Angeles to the east. The geography of Hollywood is diverse.

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[1] *SB 743: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743*

[2] *California Public Resources Code Section 21099(a) and (d)(1)*

[3] *Id. at Section 21099(a)(1)*

[4] *Id. at Section 21099(a)(4)*

[5] *Id. at Section 21099(a)(7)*

The HCP is bisected by the Santa Monica Mountains, which extends from the HCP's northern border to Franklin Avenue. Elevations of the Santa Monica Mountain in Griffith Park vary from 384 to 1,625 feet above sea level. The flatlands stretch south from Franklin Avenue, to Melrose Avenue in the east and to Rosewood Avenue in the west. The Los Angeles River defines the northeastern edge of the HCP.

The Project Site is surrounded by an eclectic mix of urban land uses. There are surface parking lot and restaurant/lounge uses (zoned C4-2D) to the north; auto body shop uses (zoned C4-2D) to the south; a Los Angeles Fire Department (LAFD) Station 27 (along Cole Avenue) and Los Angeles Police Department (LAPD) Hollywood Station (along Wilcox Avenue) (zoned PF-1XL) to the southwest; Commercial uses and surface parking (zoned C4-2D-SN) to the southeast; an office/production use (zoned C4-2D); and a 7-level parking structure and Cinerama Dome commercial center (zoned C4-2D-SN) to the east. The nearest residential uses are approximately 530 feet southwest on Fountain Avenue and Cole Avenue. Additional residential uses are approximately 520 feet west on De Longpre and Wilcox Avenue. Heights in the area vary from one story to the west, and increase to several stories to the east (parking structure for the Arclight Cinemas center). The corner of Sunset and Cahuenga has a 15-story office building and the corner of Ivar and Cahuenga has a 9-story office building. The architecture of the area is varied, with modern architecture of the Cinerama Dome, unadorned masonry buildings, and modern glass towers.

The Project Site is in a flat area of Hollywood with a grid of streets south of Sunset Boulevard and is lined with a mostly commercial corridor on Cahuenga Boulevard. The existing visual character of the surrounding locale is highly urban and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Project Site is located within a densely developed urban area. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site, structures on adjacent parcels, and the area's relatively flat topography. Due to the existing built environment, there are limited and obstructed views of the nearby Santa Monica Mountains/Hollywood Hills, located approximately 1 mile to the north. There are no remarkable views, or scenic vistas to the east, west, or south. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons. Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact[6].

Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height,

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[6] *See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].*

and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc.[7] There are no tall or topographic features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community. At the street level, views in all directions are largely constrained by structures on adjacent parcels. Cahuenga Boulevard provides the major north-south view corridor. From the public sidewalks, there are views northward toward the buildings on the corners at Sunset and Cahuenga. East-west views are available only from local streets in a grid pattern such as De Longpre. The local area is relatively flat with no elevated positions on which any public views could be claimed. Views looking toward the Project Site show no substantial views. There are currently buildings on the Project Site and on adjacent lots that obstruct views of the Hollywood Hills. No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. Therefore, impacts will be less than significant.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway?

Less Than Significant Impact. A significant impact would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway. There are no identified scenic resources such as rock outcroppings or historic buildings located on-site. The building has not been identified as requiring Historic Preservation Review[8] or on the City's Historic Places LA map.[9] An Intensive Historic Resource Survey in the Hollywood Redevelopment Project Area identified the Site as category 6Z[10] (Found ineligible for National Register, California Register or local designation through survey evaluation).[11] The building has been significantly altered and retains little or no integrity. Alterations include altered facades, entrances, and decorative elements.[12] There are no major open spaces and there are no aesthetically significant man-made features (such as major architectural structures, monuments, or gardens) on the Project Site. There are no street trees on the City sidewalk around the Site. There are no ornamental plants or sidewalk grass strips around the Site. The Project Site is not located within or along a designated scenic highway, corridor, or parkway. The nearest historic parkway is Mulholland Highway approximately 2 miles north of the Project Site. The Pacific Coast Highway (State Route 1) is an "Eligible State Scenic Highway – Not Officially

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7 *L.A. CEQA Thresholds Guide, 2006, section A.1 Aesthetics.*

8 *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/*

9 *Historic Places LA: http://www.historicplacesla.org/map*

10 *Intensive Historic Resource Survey: http://preservation.lacity.org/files/Hollywood_CRA_Survey_Index_0.pdf*

11 *Making SurveyLA Evaluations: http://preservation.lacity.org/files/Making%20SurveyLA%20Evaluations.pdf*

12 *Survey LA: http://preservation.lacity.org/files/Hollywood_DPR_Forms_Individual_Resources_6Z_2_of_3.pdf*

Designated", and is approximately 11.5 miles west of the Project Site. [13] The Project would not affect scenic resources. Therefore, impacts will be less than significant.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. A significant impact may occur if a project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site. The Project would create a mix of uses (hotel and commercial restaurant and retail) that complements the adjacent Dome Entertainment Center as an entertainment and tourist destination. The Project would be compatible with and complementary to the surrounding area because it would consist of uses that already exist in the area and would blend these uses not block-by-block but within the same parcel and building. Several hotels exist in the area north of Sunset and along Hollywood Boulevard. The Project would further activate the area by constructing a new, contemporary building with ground-floor retail and restaurant uses. This development would activate a currently underutilized parcel that contains a one-story building with office uses.

The Project Site is located in an urbanized and fully developed portion of the City. The built environment is characterized by a variety of architectural styles, age of buildings, type of developments, and size. Due to development and constraints of smaller streets (alley and De Longpre) the building would be primarily viewed from its Cahuenga Boulevard and Ivar frontages. The building design makes a clear distinction between the ground floor commercial uses and the upper level hotel uses with a transition element of color accents and window sizing and placement. The ground floor storefront glass windows take up a larger portion of the wall area whereas the hotel windows are smaller for privacy. Several large scale window elements further break up the massing along the lower southwest and southeast corners, at the upper northwest corner, and in the center of the south-facing frontage at the pool terrace. Decorative planter boxes are arranged along some windows to provide some variety in the façade. The building is unified through the use of complimentary colors and materials to create a design synergy along its frontage. The building is anticipated to use materials such as wood panels, metal clad columns, glass guardrails, and metal panels to provide different textures and elements in the building façade. The Project supports walkability with ground floor commercial. Moreover, the Project's design reduces its apparent bulk and mass. The façade features articulation (window and planters pop out) and material changes to reduce its apparent bulk. Therefore, the Project would not degrade the existing visual character or quality of the Project Site and its surroundings and impacts would be less than significant.

There will be landscaping around the Site at the ground floor, in a central courtyard, and on the rooftop pool area. The Project would be landscaped according to LAMC Section 12.40 and 12.41.

Other visual and aesthetic considerations

[13] *California Scenic Highway Mapping Systems: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm*

While the Project Site is under construction, construction walls and barriers would be erected, which have the potential to attract unauthorized bills and postings. The Project shall comply with the following provisions of the Los Angeles Municipal Code (LAMC):

Regulatory Compliance Measures

Vandalism

The project shall comply with all applicable building code requirements, including the following:

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Los Angeles Municipal Code Section 91.8104.

- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Los Angeles Municipal Code Section 91.8104.15.

Signage on Construction Barriers

The project shall comply with the Los Angeles Municipal Code Section 91.6205, including but not limited to the following provisions:

- The applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: "POST NO BILLS".

- Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier.

- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

Aesthetics (Landscape Plan)

All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The Project Site and surrounding area are highly urbanized and contains numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potentially reflective surfaces introduced by the Project include new windows at the Project Site and automobiles traveling on streets in the vicinity of the Project Site.

Light

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding commercial uses. Vehicle headlights from traffic on Cahuenga Boulevard, Ivar Avenue, and De Longpre Avenue also contribute to overall ambient lighting levels. The Project would create additional sources of illumination. The Project Site currently contains a 2-story, approximately 10,659 square foot office building used for post-production office uses and surface parking. There is on-site night/security lighting. The Project would develop a 7-story building with windows and the amount of interior lighting through windows would increase. The Project would provide illumination at street level for security. All security lighting on the upper levels will be shielded and focused on the Project Site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient "glow" presently associated with urban settings and with this part of the City, Project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses. Residential uses are buffered from ambient light impacts by existing commercial and civic (Police and Fire Stations) structures. The Project will include architectural features and facades with a low level of reflectivity. As such, the Project would not result in a substantial amount of light that would adversely affect the day or night time views in the Project vicinity. Though the Project will increase ambient light levels in the vicinity, the increase will not be substantial because the Project Site is located in an urbanized area that is already illuminated at night, and the Project's lighting levels would be compatible with surrounding uses. Exterior lighting would be designed to confine illumination to the Project Site and off-site areas that do not include light-sensitive uses. Due to SB 743, the change in levels of ambient illumination will be less than significant. See also project design features below.

Glare

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset. The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating. Due to SB 743, the Project will not result in a new source of substantial glare. Impacts will be less than significant. See also project design features below.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the sun. Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months. "Solstice" is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun's apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 1/2° of the arc. At winter solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. At the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year.

Screening Criteria and Thresholds of Significance[14]

[14] *L.A. CEQA Thresholds Guide, 2006, section A.3 Shading.*

Would the project include light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest or northeast?

- A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Shading, and review the associated Methodology to Determine Significance, as appropriate.

- A "no" response to the [screening criteria] indicates that there would normally be no significant impact on Shading from the proposed project.

A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce.

The proposed height is 86'-6" (Top of Roof). Thus, the Project exceeds the screening criteria for shadow analysis. As stated above, the screening criteria looks at distances three times the height of the proposed structure to any shadow sensitive uses. Three times the Projects' 87-foot height equals 261 feet. Per the screening criteria of the L.A. CEQA Thresholds Guide, there are no shadow-sensitive uses within approximately 261 feet of the Project Site to the north, northwest, or northeast. The transition of the sun will move shadows along this arch (from 45 degrees/west at 9 AM to 0 degree/north at 12 PM to 45/east at 3 PM). The northwest area contains an auto shop, a parking structure, and Cahuenga Boulevard. The north area contains a surface parking lot, commercial buildings, and Lure Nightclub. The Lure Nightclub has events that begin after sundown[15] so it not daytime shadow-sensitive use. In addition, Lure Nightclub is only open Fridays and Saturdays at 10 pm, and Sundays at 6 pm.[16] These times are outside the screening criteria for shadows. The northeast area contains the Cinerama Dome commercial center and parking structure, and Ivar Avenue. These buildings do not have useable outdoor space. As shown in Appendix A, the building would cast summer shadows primarily along Cahuenga Boulevard, the alley to the north, and Ivar Avenue, as well as against the parking structure to the east. As shown in Appendix A,

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[15] *http://www.lurehollywood.com/events/*

[16] *Lure Nightclub Contact phone call at 323-463-0004 on August 26, 2015.*

the building would cast winter shadows along Cahuenga Boulevard and parking lots to the northwest, the alley and parking lot to the north, and Ivar Avenue and the parking structure to the northeast. Thus, none of these uses is considered shadow sensitive. In addition, the context of the area is highly urban and commercial, with less of an expectation of uninterrupted sun than a recreational or residential area. Finally, the zoning allows unlimited height so the area is expected to support multi-story buildings. Therefore, there would be no impact to shadow-sensitive uses.

Project Design Features

Aesthetics (Light)

Outdoor lighting shall be designed and installed with shielding, such that the light sources cannot be seen from adjacent residential properties, the public right-of-way.

Aesthetics (Glare)

The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

2. AGRICULTURE AND FORESTRY RESOURCES

a) Would the project 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. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is zoned C4-2D (Commercial Zone, Height District 2, Development Limitation), and the General Plan land use designation is Regional Center Commercial. The Site is developed with a building and surface parking. The Project Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[17] Therefore, the Project would have no impact on the conversion of farmland to non-agricultural uses.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[18] The Project Site is not zoned for agricultural use and is not subject to a Williamson Act Contract. The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use. Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

c) Would the project 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 section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

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[17] *State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf, August 26, 2015.*

[18] *State of California Department of Conservation, Williamson Act Program, website: http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, August 26, 2015.*

No Impact. Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. No impacts related to forest land or timberland will occur.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project Site is completely surrounded by urban uses and infrastructure, and is not forest land. No impact related to the loss of forest land or conversion of forest land will occur.

e) Would the project 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. A significant impact may occur if a project involves other changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is located in Hollywood, which is highly urbanized. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land and such uses are not in proximity to the Project Site. No impacts related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use will occur.

3. AIR QUALITY

The section is based in part on the following item, included as Appendix B of this IS/MND:

B Air Quality, Greenhouse Gases, and Noise Appendices, DKA Planning, November 2015.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter ten microns or less in diameter (PM_{10}), and lead (Pb). These pollutants are discussed below.

Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. Inversions are an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air. The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

Ozone (O_3) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO_X) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_X, the components of O_3, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

Nitrogen Dioxide (NO_2) like O_3, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_X and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10}. High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.

Sulfur Dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO_2 are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 can also yellow plant leaves and erode iron and steel.

Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC. Inhalable particulate matter, or PM_{10}, is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the

phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decreases in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

Regulatory Setting

Federal

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by CARB.

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in Table 3.3-1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O_3 and $PM_{2.5}$, attainment for PM_{10}, maintenance for CO, and attainment/unclassified for NO_2.

State

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more

stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in Table 3.3-1. The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Local

South Coast Air Quality Management District (SCAQMD). The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour $PM_{2.5}$ strategy standard.

Table 3. 3-1

State And National Ambient Air Quality Standards And Attainment Status

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	/a/	0.075 ppm (147 µg/m^3)	Nonattainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Nonattainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Nonattainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Nonattainment
	Annual Arithmetic Mean	12 µg/m^3	Nonattainment	12 µg/m^3	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Unclassified/ Attainment
	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Unclassified/ Attainment
Sulfur Dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Nonattainment

/a/ CARB has not determined 8-hour O_3 attainment status.

Source: CARB, Ambient Air Quality Standards, and attainment status, accessed October 20, 2014 (www.arb.ca.gov/desig/adm/adm.htm)

The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP through the adoption of its Regional Transportation Plan (RTP). This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in State law. In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

City of Los Angeles. The City's General Plan includes an Air Quality Element that provides a policy framework that governs air quality planning within the City of Los Angeles. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air goals. In 2006, the City released its L.A. CEQA Thresholds Guide that provides guidance in the preparation of environmental documents. This included a chapter focusing on air quality. While it didn't set new thresholds of significance for air quality, it did suggest a process for evaluating projects and attempted to standardize analyses through prescribed protocols.

Air Pollution Climatology

The Project site is located within the Los Angeles County non-desert portion of the South Coast Air Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region. The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains.

Air quality problems also occur during the fall and winter, when CO and NO_2 emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest

CO concentrations in the Basin are associated with heavy traffic. NO_2 concentrations are also generally higher during fall and winter days.

Air Monitoring Data

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project Sites are located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table 3.3-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2012 through 2014. The one-hour State standard for O_3 was exceeded three times during this three-year period, the daily State standard for PM_{10} was exceeded eight times while the daily State standard for $PM_{2.5}$ was exceeded five times. CO and NO_2 levels did not exceed the CAAQS from 2012 to 2014.

Table 3.3-2
2012-2014 Ambient Air Quality Data In Project Vicinity

Pollutant	Pollutant Concentration & Standards	Central Los Angeles		
		2012	2013	2014
Ozone	Maximum 1-hour Concentration (ppm)	0.093	0.081	0.113
	Days > 0.09 ppm (State 1-hour standard)	0	0	3
	Days > 0.075 ppm (Federal 8-hour standard)	1	0	2
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	N/A	N/A	N/A
	Days > 20 ppm (State 1-hour standard)	N/A	N/A	N/A
	Maximum 8-hour Concentration (ppm)	1.9	2.0	2.0
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0773	0.0903	0.0821
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}	Maximum 24-hour Concentration ($\mu g/m^3$)	80	57	66
	Days > 50 $\mu g/m^3$ (State 24-hour standard)	4	1	3
$PM_{2.5}$	Maximum 24-hour Concentration ($\mu g/m^3$)	58.7	43.1	N/A
	Days > 35 $\mu g/m^3$ (Federal 24-hour standard)	4	1	N/A
Sulfur Dioxide	Maximum 24-hour Concentration (ppm)	N/A	N/A	N/A
	Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A

Source: SCAQMD annual monitoring data (www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year) accessed October 25, 2015.
N/A: Not available at this monitoring station. Monitoring stations often do not measure every pollutant

Toxic Air Pollution

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV), the incidence of cancer over a lifetime in the US population is about 1 in 4, to 1 in 3, which translates into a risk of about 300,000 in 1 million (SCAQMD 2015). One study, the *Harvard Report on Cancer Prevention*, estimated

that, of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures (Harvard 1996). The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per million, this would predict an additional 100 excess cases of cancer in a population of 1 million people over a 70-year lifetime. As part of the SCAQMD's environmental justice initiatives adopted in late 1997, the SCAQMD adopted the MATES IV study in May 2015, which was a follow-up to the previous MATES I, II, and III air toxics studies conducted in the Basin. The MATES IV study was based on actual monitored data throughout the Basin and consisted of several elements. These included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Basin from exposure to TACs. The MATES IV study applied a 2-kilometer (1.24-mile) grid over the Basin and reported carcinogenic risk within each grid space (each covering an area of 4 square kilometers or 1.54 square miles). The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 897 in 1 million primarily due to diesel exhaust particulate matter (DPM). Using the MATES IV methodology, about 94 percent of the cancer risk is attributed to emissions associated with mobile sources, and about 6 percent of the risk is attributed to toxics emitted from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations. The MATES IV study found lower ambient concentrations of most of the measured air toxics, as compared to the levels measured in the previous MATES III study finalized in September 2008.

Existing Emissions

The Project site includes a 10,659 square foot office building with surface parking. As shown in Table 3.3-3, the majority of emissions are generated from mobile sources that access the commercial uses at the Project Site.

Table 3.3-3
Estimated Existing Daily Operations Emissions - Unmitigated

Emission Source	Pounds per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	<1	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	<1	1	4	<1	1	<1
Total Operations	**1**	**1**	**5**	**<1**	**1**	**<1**

Source: DKA Planning 2015 based on CalEEMod 2013.2.2 model runs.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. There are two existing or reasonably foreseeable sensitive receptors near the Project Site, including:

- Multi-family residences at De Longpre and Wilcox; approximately 530 feet west of the Site.
- Multi-family residences at Fountain and Cole; approximately 530 feet southwest of the Site.

Project Consistency with Air Quality Plans

SCAQMD Air Quality Management Plan. The proposed hotel and retail-use project will neither conflict with the SCAQMD's 2012 Air Quality Management Plan (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 the Southern California Association of Governments (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 2012 RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020. The Draft 2016 RTP/SCS released for public review on December 4, 2015 accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040. 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 Project is consistent with the City's projected growth capacity for the Community Plan area, which accommodated a projected population of 224,602 persons, housing base of 113,729 units, and 119,013 jobs by 2030.[19]

The Project would demolish 10,659 square feet of commercial office space and develop 175 hotel rooms and 5,643 square feet of associated commercial space in the City of Los Angeles. The Project would not add residents to the Plan. The Project site is classified as "Commercial" in the Community Plan, a zoning classification that allows the proposed uses. As such, the RTP/SCS' assumptions about growth in the City likely accommodate employment growth on this site. As such, the Project does not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

[19] *City of Los Angeles, Hollywood Community Plan,* http://cityplanning.lacity.org/cpu/hollywood/text/HwdCommunityPlan.pdf.

City of Los Angeles General Plan Air Quality Element. The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As illustrated in Table 3.3-4, the Project is consistent with the applicable policies in the General Plan. As such, the Project's impact on the City's General Plan would be considered less than significant.

The air quality impacts of non-residential development on the Project site are accommodated in the region's emissions inventory for the 2012 RTP/SCS and 2012 AQMP. The Project is therefore not expected to conflict with or obstruct implementation of the AQMP, and any impact on the Plan would be considered less than significant. Similarly, the Project is consistent with the City's General Plan Air Quality Element's policies and would not conflict with its six goals and 15 objectives.

Table 3.3-4

Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**Consistent.** The Project would minimize particulate emissions during construction through best practices required by SCAQMD Rule 403 (Fugitive Dust) and/or mitigation measures.
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent.** The Project would minimize particulate emissions from unpaved facilities through best practices required by SCAQMD Rule 403 (Fugitive Dust) and/or mitigation measures.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority (i.e., Routes 2, 302, 210, DASH Hollywood) and the Metro Red Line stations at Hollywood and Highland and at Hollywood and Vine about 0.5 miles away.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Consistent.** Where appropriate, the property management company could encourage telecommuting with future tenants.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Not Applicable.** Where appropriate, the property management company could encourage future tenants to promote rideshare programs and subsidies. The project would have WiFi available for guests that would encourage telecommuting.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Not Applicable.** The Project includes employers that could implement parking management programs.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The Project does not include special events that would require traffic management.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** The Project would minimize traffic impacts below significance thresholds.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Los Angeles County Metropolitan Transportation Authority, and other regional agencies on the coordination of land use, air quality, and

Table 3.3-4

Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
	transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The Project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The Project would be infill development that would provide residents with proximate access to jobs, shopping, and other uses.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities with alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority (i.e., Routes 2, 302, 210, DASH Hollywood) and the Metro Red Line stations at Hollywood and Highland and at Hollywood and Vine about 0.5 miles away. Ample bicycle facilities would be located on-site to encourage active transportation.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The Project's air quality impacts will be analyzed and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority (i.e., Routes 2, 302, 210, DASH Hollywood) and the Metro Red Line stations at Hollywood and Highland and at Hollywood and Vine about 0.5 miles away.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Not Applicable.** This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants.

Table 3.3-4

Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
plants in order to reduce air emissions.	
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Not Applicable.** This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric of low-emitting fuels.	**Consistent.** The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs.
Source: DKA Planning, 2015.	

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. A project could have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Both short-term impacts occurring during construction (e.g., site grading, haul truck trips) and long-term effects related to the ongoing operation of the Project are discussed. This analysis focuses on two levels of impacts: pollutant emissions and pollutant concentrations. "Emissions" refer to the quantity of pollutants released into the air. "Concentrations" refer to the amount of pollutant material per volumetric unit of air, as measured in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$).

Project Impacts

Construction Phase

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2013.2.2 model using assumptions from the Project's developer, including the Project's construction schedule of 20 months. Key assumptions include demolition of 10,659 square feet of existing improvements, export of 33,000 cubic yards of soils; demolition phase (one month), site preparation (two weeks), grading phase (four months), construction phase (14 months), a paving phase (two weeks), and architectural coatings phase (four months).

As shown in Table 3.3-5, the construction of the Project would produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not 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 (e.g., ozone). This impact is considered less than significant.

Table 3.3-5
Estimated Daily Construction Emissions - Unmitigated

Construction Phase	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition						
On-Site Emissions	1	11	9	<1	1	1
Off-Site Emissions	1	13	11	<1	1	<1
Total Emissions	2	24	20	<1	2	1
Site Preparation						
On-Site Emissions	1	14	7	<1	1	1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	1	14	7	<1	1	1
Grading						
On-Site Emissions	1	11	9	<1	2	1
Off-Site Emissions	1	13	10	<1	1	<1
Total Emissions	2	23	19	<1	3	1
Building Construction						
On-Site Emissions	1	14	8	<1	1	1
Off-Site Emissions	<1	1	6	<1	1	<1
Total Emissions	1	15	14	<1	2	1
Paving						
On-Site Emissions	1	11	7	<1	1	1
Off-Site Emissions	<1	<1	<1	<1	<1	<1
Total Emissions	1	11	7	<1	1	1
Architectural Coating						
On-Site Emissions	16	2	2	<1	<1	<1
Off-Site Emissions	<1	<1	1	<1	<1	<1
Total Emissions	16	2	3	<1	<1	<1
Maximum Regional Total (maximum daily emissions for each pollutant regardless of phase)	16	24	20	<1	2	1

Table 3.3-5
Estimated Daily Construction Emissions - Unmitigated

Construction Phase	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	16	14	9	<1	1	1
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	No	No	No	No	No	No

These figures are rounded to the nearest integer.
Source: DKA Planning, 2015 based on CalEEMod 2013.2.2 model runs. Data in Appendix to this IS/MND.
LST analyses based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.

In terms of local air quality, the Project would produce significant emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO_2, CO, PM_{10} and $PM_{2.5}$ during the construction phase. As a result, construction impacts on localized air quality are considered **less than significant**.

As shown in Table 3.3-5, construction of the Project is not expected to produce any local violation of air quality standards or contribute substantially to an existing or projected air quality violation.

Regulatory compliance measures are those that will be imposed by the SCAQMD. Specifically, the measures address fugitive dust emissions of PM_{10} and $PM_{2.5}$ that would be regulated by SCAQMD Rule 403, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. It should be noted that Table 3.3-5 conservatively does not assume the application of BACMs to control fugitive dust. The regulatory compliance measures call for use of lower-VOC coatings, paints, and solvents that are mandated by the SCAQMD.

Regulatory Compliance Measures

Demolition, Grading and Construction Activities

The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- Trucks having no current hauling activity shall not idle but be turned off.

California Code of Regulations Measures

- In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

SCAQMD Measure

- The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

Operational Phase

The Project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project site. The Project could add up to 1,748 net vehicle trips to and from the Project site on a peak weekday at the start of operations in 2018.[20] Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10} and $PM_{2.5}$ emissions (Table 3.3-6). As a result, the Project's operational impacts on regional air quality are considered less than significant.

[20] *Overland Traffic Consultants, Inc., Traffic Impact Analysis for Tommie Hotel; November 2015.*

With regard to localized air quality impacts, the Project would emit minimal emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from area and energy sources on-site. As shown in Table 3.3-6, 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. The Project's operational impacts on localized air quality are considered less than significant. The long-term operation of the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality.

Table 3.3-6
Estimated Daily Operations Emissions - Unmitigated

Emissions Source	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	2	<1	<1	<1	<1	<1
Energy Sources	<1	1	1	<1	<1	<1
Mobile Sources	5	13	53	<1	9	3
Total Operations	7	13	54	<1	9	3
Existing Operations	-1	-1	-5	-<1	-1	-<1
Net Regional Total	**6**	**12**	**49**	**<1**	**9**	**3**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	**2**	**1**	**1**	**<1**	**<1**	**<1**
Localized Significance Threshold	**-**	**74**	**680**	**-**	**2**	**1**
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning 2015 based on CalEEMod 2013.2.2 model runs. Data in Appendix to this IS/MND.

c) Would the project 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 (including releasing emissions, which exceed quantitative threshold for ozone precursors)?

Less Than Significant Impact. Construction of the Project would not contribute significantly to cumulative emissions of pollutants for any non-attainment pollutants. For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. As such, the Project's impact on cumulative ozone precursor emissions would be considered less than significant. Similarly, regional emissions of PM_{10} and $PM_{2.5}$ would not exceed mass thresholds established by the SCAQMD; therefore, construction emissions impacts would be considered less than significant. Compliance with AQMD's requirements on project level is enough for cumulative impacts as well.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. There

are 85 proposed developments that were identified by the Project's traffic study.[21] Four of them are within two blocks of the Project site:

- No. 68: 1311 North Cahuenga Blvd. 375 apartment units and 2,500 square feet of commercial use.
- No. 69: 1341 Vine St. 100-room hotel, 282,500 square feet of office uses, and 250 apartment units.
- No. 74 - 1310 Cole Ave. 375 apartment units and 2,800 square feet of creative office.
- No. 76 - 6322 De Longpre. 250 apartment units; 223, 665 square feet of office; 33,000 square feet of retail; and 9,135 square feet of restaurants.

If any of these proposed projects were to undertake construction concurrently with the Project, localized CO, $PM_{2.5}$, PM_{10}, and NO_2 concentrations would not exceed ambient air quality standards at nearby receptors. The application of LST thresholds to each cumulative project in the local area would help ensure that each project does not produce cumulative localized hotspots of CO, $PM_{2.5}$, PM_{10}, and NO_2. Any projects that would exceed LST thresholds would perform dispersion modeling to mitigate any significant localized emissions. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting LST mass emissions thresholds for PM_{10} that generally double with every doubling of distance. As such, the cumulative impact of construction projects on local sensitive receptors would be considered less than significant.

Construction of the Project would not produce cumulative considerable emissions of localized nonattainment pollutants NO_2, CO, PM_{10} and $PM_{2.5}$, as the anticipated emissions would not exceed LST thresholds set by the SCAQMD. This is considered a less than significant impact.

While no mitigation measures are required, the regulatory compliance measures listed above would require good housekeeping measures that substantially reduce PM_{10} and $PM_{2.5}$ emissions during on-site construction activities and use of lower-VOC content coatings. Construction of the Project would not have any considerable contribution to cumulative impacts on pollutant concentrations at nearby receptors with implementation of regulatory compliance measures.

Operation Phase Air Quality Impacts

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in Table 3.3-6, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The SCAQMD's thresholds for ozone precursors ensure that a project's impact will not

[21] *Overland Traffic Consultants, Inc., Traffic Impact Analysis for Tommie Hotel, January 2016.*

produce cumulatively considerable emissions that would contribute to regional ozone violations. The Project is a mixed-use project that does not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM_{10} and $PM_{2.5}$ would be minimal. Similarly, existing land uses in the area include commercial land uses that do not produce substantial emissions of localized nonattainment pollutants. A less-than significant project impact does not make a cumulatively considerable contribution to a cumulative impact. Long-term operation of the Project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Construction of the Project could produce air emissions that impact two existing sensitive receptors near the Project Site, including:

- Multi-family residences at De Longpre and Wilcox; approximately 530 feet west of the Site.
- Multi-family residences at Fountain and Cole; approximately 530 feet southwest of the Site.

As illustrated in Table 3.3-5, these nearby receptors would not be exposed to substantial concentrations of localized pollutants NO_2, CO, PM_{10} and $PM_{2.5}$ from construction of the Project. Specifically, construction activities would not exceed SCAQMD LST thresholds and would result in a less than significant impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard. Regulatory compliance measures would require the use of off-road construction equipment and good housekeeping measures that substantially reduce PM_{10} and $PM_{2.5}$ emissions during on-site construction activities.

Operation Phase Air Quality Impacts on Sensitive Receptors

Because the Project would not generate long-term on-site emissions that exceed the SCAQMD's LST thresholds, it would not result in pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at sensitive receptors and would be considered less than significant. Further, off-site emissions from mobile sources would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.

Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.[22]

[22] *Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.*

Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. Traffic levels of service at the twelve intersections studied in the vicinity of the Project would not be significantly impacted by traffic volumes from the development under existing or 2018 horizon scenarios.[23] In addition, the Project would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow.

Finally, TAC emissions are not expected to be significant, as the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[24] The Project is not anticipated to generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities, and any minimal TAC impacts are expected to be less than significant. Long-term operation of the Project would not have any significant impacts on pollutant concentrations at nearby receptors.

e) Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Odors are usually associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Project would introduce hotel and commercial uses to the area but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e. Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses such as SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations). As a result, any odor impacts from the Project would be considered less than significant.

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[23] *Overland Traffic Consultants, Inc., Traffic Impact Analysis for Tommie Hotel; January 2016.*

[24] *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.*

4. BIOLOGICAL RESOURCES

a) Would the project 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 regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated 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[25] (CDFW) or the U.S. Fish and Wildlife Service (USFWS). The Project Site is located in an urbanized area of the City. The Project Site is zoned C4-2D (Commercial Zone, Height District 2, Development Limitation), and the General Plan land use designation is Regional Center Commercial. The Site is developed with a building and surface parking. There are no street trees on the City sidewalk or landscaping on the Site. There are no City or County significant ecological areas.[26] The Project will not result in a take of nesting native bird species. Therefore, the Project will remove or modify habitat for any identified species because no habitat exist on the Site. There would be no impact.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS were to be adversely modified without adequate mitigation. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. The nearest riparian habitat is in the Hollywood Hills, north of Hollywood Boulevard and west of La Brea Avenue, classified as Forested/Shrub Riparian and within Wattles Garden Park and Runyon Canyon Park.[27] These habitat areas are approximately 1.5 miles northwest of the Project Site and will not be affected by Project construction or operations. Therefore, no impact to riparian habitat or sensitive natural community will occur.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal

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[25] *Effective January 1, 2013, the California Department of Fish and Game changed its name to the California Department of Fish and Wildlife: http://www.dfg.ca.gov/about/namechange.html*

[26] *Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/navigatela/*

[27] *U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: http://www.fws.gov/wetlands/Data/Mapper.html, August 26, 2015.*

pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project without adequate mitigation. No federally protected wetlands (e.g., estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site. The nearest wetland is in the Hollywood Forever Cemetery approximately 0.8 miles southeast of the Site. This is classified as Freshwater Pond. Additionally, there are wetlands in the Hollywood Hills north of Hollywood Boulevard and west of La Brea Avenue. These are classified as Riverine and Freshwater Forested/Shrub Wetlands and are within Wattles Garden Park and Runyon Canyon Park.[28] These habitat areas are approximately 1.5 miles northwest of the Project Site and will not be affected by Project construction or operations. Therefore, the Project will not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. No impact to federally protected wetlands will occur.

d) Would the project 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. A significant impact would occur if a project would interfere with or remove access to a migratory wildlife corridor or impede the use of wildlife nursery sites. Due to the existing urban development on the Project Site and in the adjacent surroundings, the Project Site does not function as a corridor for the movement of native or migratory animals. Additionally, no native wildlife nurseries are located in the Project area. Therefore, no impacts to migratory wildlife corridors or native wildlife nursery site will occur.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. A project-related significant adverse effect could occur if a project would cause an impact that is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance. The Project Site is located in an urbanized area of the City. There are no street trees or landscaping on the Site. The Project would not impact any protected trees. Therefore, the Project would not conflict with any local policy or ordinance protecting biological resources.

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[28] *U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Mapper, website: http://www.fws.gov/wetlands/Data/Mapper.html, August 26, 2015.*

f) Would the project 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. A significant impact would occur if a project conflicts with mapping or policies in any conservation plans of the types cited. The Project Site is located in an urbanized area of the City. Due to the existing urban development on the Project Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site or in the vicinity. There are no City or County significant ecological areas.[29] The Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact will occur.

[29] *Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/navigatela/*

5. CULTURAL RESOURCES

The section is based in part on the following items, included as Appendix C of this IS/MND:

C-1 Archaeology Records Search, South Central Coastal Information Center, August 17, 2015.

C-2 Paleontology Records Search, Natural History Museum, August 11, 2015.

C-3 Sacred Lands File Search, Native American Heritage Commission, August 6, 2015.

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in *State CEQA Guidelines* §15064.5?

No Impact. *State CEQA Guidelines* Section 15064.5 defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

Regulatory Setting

National Register of Historic Places

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:[30]

A. Associated with events that have made a significant contribution to the broad patterns of our history; or

B. Associated with the lives of persons significant in our past; or

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

[30] *Title 36 Code of Federal Regulations Part 60.4.*

D. Yield, or may be likely to yield, information important in prehistory or history.

Physical Integrity

According to *National Register Bulletin #15*, "to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity." Integrity is defined in *National Register Bulletin #15* as "the ability of a property to convey its significance."[31] Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials.

Context

To be eligible for listing in the National Register, a property must also be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are "those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear."[32] A property must represent an important aspect of the area's history or prehistory and possess the requisite integrity to qualify for the National Register.

California Register of Historical Places

California Register criteria are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or

2. It is associated with the lives of persons important to local, California, or national history; or

3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or

4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

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[31] *National Register Bulletin #15, pp. 44-45.*

[32] *National Register Bulletin #15.p. 7.*

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.[33]

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:

1. The survey has been or will be included in the State Historic Resources Inventory;

2. The survey and the survey documentation were prepared in accordance with office [California Office of Historic Preservation (OHP)] procedures and requirements;

3. The resource is evaluated and determined by the office [OHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and

4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

State Office of Historic Preservation Survey Methodology

The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.

2. Determined eligible for listing in the National Register or the California Register.

3. Appears eligible for listing in the National Register or the California Register through survey evaluation.

4. Appears eligible for listing in the National Register or the California Register through other evaluation.

5. Recognized as historically significant by local government.

6. Not eligible for listing or designation as specified.

7. Not evaluated or needs re-evaluation.

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[33] *Public Resources Code Section 4852.*

City of Los Angeles Cultural Heritage Ordinance

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et. seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments. The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture and architecture. Administrative Code Section 22.171.7 states that:

> *For purposes of this article, a Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.*

Unlike the National and California Registers, the Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as Monuments.

Determining the Significance of Impacts on Historical Resources

The State CEQA Guidelines

- Substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource is materially impaired.

The Guidelines go on to state that the significance of a historic resource is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources.[34]

City of Los Angeles' "L.A. CEQA Thresholds Guide"

- Demolition of a significant resource;

[34] *14 CCR Section 15064.5(b)(2).*

- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Secretary of the Interior Standards

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated

from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Potential Project Impacts

The Project does not involve the demolition of any historic resources. The existing buildings on the Project Site that would be demolished do not represent historic resources subject to CEQA. The building has not been identified as requiring Historic Preservation Review[35] or on the City's Historic Places LA map.[36] An Intensive Historic Resource Survey in the Hollywood Redevelopment Project Area identified the Site as category 6Z[37] (Found ineligible for National Register, California Register or local designation through survey evaluation).[38] The building has been significantly altered and retains little or no integrity. Alterations include altered facades, entrances, and decorative elements.[39] Therefore, no impact will occur.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to *State CEQA Guidelines* §15064.5?

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains an existing building and surface parking. The South Central Coastal Information Center conducted a records search and has archaeological or built-environment resources within the Project area (Appendix C-1 to this IS/MND). The Project would require excavation for subterranean parking levels, utility and foundation work, and grading. Thus, there is the potential for buried archeological, prehistoric and historic resources within the Project Site. However, the Project shall comply with the following regulatory compliance measure and impacts will be less than significant.

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[35] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/*

[36] *Historic Places LA: http://www.historicplacesla.org/map*

[37] *Intensive Historic Resource Survey: http://preservation.lacity.org/files/Hollywood_CRA_Survey_Index_0.pdf*

[38] *Making SurveyLA Evaluations: http://preservation.lacity.org/files/Making%20SurveyLA%20Evaluations.pdf*

[39] *Survey LA: http://preservation.lacity.org/files/Hollywood_DPR_Forms_Individual_Resources_6Z_2_of_3.pdf*

Regulatory Compliance Measure

Archaeological

If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. 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.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains an existing building and surface parking. The Project would require excavation for subterranean parking levels, utility and foundation work, and grading. The Natural History Museum conducted a paleontology records search and has no vertebrate fossil localities that lie directly within the proposed project area, but does have localities nearby from the same sedimentary deposits that occur within the proposed project area (Appendix C-2 to this IS/MND). Thus, there is still the potential for buried paleontological resources within the Project Site. However, the Project shall comply with the following regulatory compliance measure and impacts will be less than significant.

Regulatory Compliance Measure

Paleontological

If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall 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.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Native American Heritage Commission (NAHC) was contacted to conduct a Sacred Lands File (SLF) Search. A response was received on August 6, 2015 (included as Appendix C-3 to this IS/MND). A record search of the NAHC Sacred Lands File failed to indicate the presence of Native American traditional cultural places in the Project Site, based on the USGS coordinates submitted as part of the Area of Potential Effect (APE). Note that the absence of archaeological or Native American sacred places does not preclude their existence at the subsurface level. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains an existing building and surface parking. The Project would require excavation for subterranean parking levels, utility and foundation work, and grading. Environmental impacts may result from Project implementation due to discovery of unrecorded human remains. However, the Project shall comply with the following regulatory compliance measure and impacts will be less than significant.

Regulatory Compliance Measure

Human Remains

If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:

  1104 N. Mission Road
  Los Angeles, CA 90033
  323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
  323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

- The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

6. GEOLOGY AND SOILS

The section is based in part on the following items, included as Appendix D of this IS/MND:

D-1 Preliminary Geotechnical Engineering Investigation, GeoConcepts, Inc., December 17, 2014.

D-2 Soils Report Approval Letter, Los Angeles Department of Building and Safety, August 17, 2015.

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of 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? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles.

Surface Rupture

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines "active" and "potentially-active" faults using the same aging criteria as that used by the California Geological Survey (CGS). However, established state policy has been to zone only those faults which have direct evidence of movement within the last 11,000 years. It is this recent fault movement that the CGS considers as a characteristic for faults that have a relatively high potential for ground rupture in the future. CGS policy is to delineate a boundary from 200 to 500 feet wide on each side of the known fault trace based on the location precision, complexity, or regional significance of the fault. If a site lies within an Earthquake Fault Zone, a geologic fault rupture investigation must be performed that demonstrates that the proposed building site is not threatened by surface displacement from the fault before development permits may be issued.

Ground rupture is the result of movement from an active fault. A fault is a fracture in the crust of the earth along which rocks on one side have moved relative to those on the other side. No known active fault is mapped on the Site.[40] The nearest such fault zone in located approximately 1,700 feet north of the Site (at Hollywood and Cahuenga) for the Hollywood Fault, according to the California Geological Survey's final map of the Hollywood Fault released November 6, 2014.[41] The Project Site is not located

[40] *Page 9, Geotechnical Engineering Investigation, December 17, 2014.*

[41] *gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_EZRIM.pdf*

within an Alquist-Priolo Earthquake Fault Zone.[42] Based on these considerations, the potential for surface ground rupture at the Project Site is considered low. Therefore, impacts would be less than significant.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located within a seismically active region. As with all of Southern California, the primary geologic hazard at the Project Site is moderate to strong ground motion (acceleration) caused by an earthquake on any of the local or regional faults. Ground shaking caused by an earthquake is likely to occur at the Site during the lifetime of the development due to the proximity of several active and potentially active faults. Generally, on a regional scale, quantitative predictions of ground motion values are linked to peak acceleration and repeatable acceleration, which are a response to earthquake magnitudes relative to the fault distance from the subject property. Southern California major earthquakes are generally the result of large-scale earth processes in which the Pacific plate slides northwestward relative to the North American plate at about 2 inches/year.[43]

However, design of the Project in accordance with the provisions of the latest California Building Code and Los Angeles Building Code (implemented at the time of building permits) will mitigate the potential effects of strong ground shaking. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the Los Angeles Municipal Code (LAMC), which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk or loss or injury. Therefore, impacts related to seismic ground shaking will be less than significant.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant with Mitigation Incorporated. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess pore pressure and cyclic loading conditions such as those induced by an earthquake. Liquefaction related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. The City of Los Angeles ZIMAS mapping system does not classify the Project Site as being within a liquefaction area.[44] The Site is not located within a liquefaction hazard zone on the State of California Seismic Hazard Zone Map.[45] To quantify the potential for liquefaction at the Site, 2 borings were drilled to test the soils and collect samples. Site liquefaction analysis of the soils

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[42] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/*

[43] *Page 9, Geotechnical Engineering Investigation, December 17, 2014.*

[44] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/*

[45] *Page 10, Geotechnical Engineering Investigation, December 17, 2014.*

underlying the Site was performed using the computer program LiquefyPro by CivilTech Software. The results of the liquefaction analysis (included within the Geotechnical Engineering Investigation, Appendix D-1 to this IS/MND) indicate a potential for liquefaction with the design earthquake input parameters. The liquefaction potential at the subject site is considered moderate to high. Therefore, mat-type foundation is considered appropriate for the proposed development. Based upon the depth to groundwater and the liquefaction analysis, surface manifestations of liquefaction should not pose any significant hazard to the proposed development provided the recommendations contained within the Geotechnical Engineering Investigation are followed and maintained.[46] The Department of Building and Safety issued an Approval Letter of the investigation and stated that the referenced report is acceptable, providing the conditions contained within the letter are complied with during Site development (letter is incorporated by reference and included in the appendix).[47] The Project shall comply with the Uniform Building Code Chapter 18. Division 1 Section 1804.5 Liquefaction Potential and Soil Strength Loss. However, the potential impact of liquefaction will be reduced to less than significance with **Mitigation Measure 6-1**.

Mitigation Measure

6-1 The Project shall comply with the recommendations contained within the Geotechnical Engineering Report submitted to the Department of Building and Safety.

The Project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, and as it may be subsequently amended or modified.

(iv) Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. A landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow. The City of Los Angeles ZIMAS mapping system [48] and the Safety Element of the City of Los Angeles[49] do not classify the Project Site as within a landslide area, or identified as a bedrock or probably bedrock landslide site. The hillside area generally includes the Hollywood Hills, north of Franklin Avenue. Small areas (5-100 acres) of bedrock landslide sites are located in central Griffith Park. Further, according to the State of California Seismic Hazards

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[46] *Page 11, Geotechnical Engineering Investigation, December 17, 2014.*

[47] *Soils Report Approval Letter, Department of Building and Safety, August 17, 2015.*

[48] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/*

[49] *Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, August 26, 2015*

Map the Site is not within an earthquake-induced landslide hazard zone.[50] The Project Site is not with in the earthquake induced landslide zone.[51] Therefore, no impacts will occur.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a Project exposes large areas to the erosional effects of wind or water for a protracted period of time. Demolition (removal of the existing buildings) and grading would expose minimal amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading process, substantial erosion will not occur. The Project would require excavation for subterranean levels. All grading activities require grading permits from the City of Los Angeles Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Division 70, which addresses grading, excavation, and fills. The grading plan will conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division.

During construction, the Project will be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs will be detailed in a Stormwater Pollution Prevention Plan (SWPPP), which is required to be acceptable to the City Engineer and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations. With the implementation of the BMPs detailed in the required SWPPP, soil erosion during construction impacts will be less than significant. Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The entire Project Site would be covered by the proposed structure; thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, operation impacts related to erosion or the loss of topsoil will be less than significant.

Mitigation Measure

6-2 Erosion/Grading/Short-Term Construction Impacts

The applicant shall provide a staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

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[50] *Page 12, Geotechnical Engineering Investigation, December 17, 2014.*

[51] *Hollywood Quadrangle, Seismic Hazard Zone map: http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_EZRIM.pdf, August 26, 2015.*

c) Would the project 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 with Mitigation Incorporated. A significant impact may occur if the Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the Project buildings, thus posing a hazard to life and property. The Site is relatively level. Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. Seismic settlement occurs when cohesionless soils density as result of ground shaking. Based upon field observations, laboratory testing and analysis, the alluvium found in the explorations should possess sufficient strength to support the proposed development.[52] Settlement of the proposed mat foundation would occur. Based on the anticipated loading condition, settlement on the order of (2) inches under the heavily-loaded center of the proposed mat foundation should be anticipated, and settlement on the order of (1) inch under the edge of the proposed foundation should be anticipated.[53] The construction of the Project is considered feasible from a geotechnical engineering standpoint provided the recommendations presented in the Geotechnical Engineering Investigation are incorporated into the design and subsequent construction.[54] This is included as **Mitigation Measure 6-1**, above. Therefore, impacts will be less than significant.

d) Would the project be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. A significant impact may occur if a Project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (decrease in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. However, expansive soils were not encountered on the Site.[55] Therefore, no impact will occur.

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[52] *Page 12, Geotechnical Engineering Investigation, December 17, 2014.*

[53] *Page 16, Geotechnical Engineering Investigation, December 17, 2014.*

[54] *Page 12, Geotechnical Engineering Investigation, December 17, 2014.*

[55] *Page 16, Geotechnical Engineering Investigation, December 17, 2014.*

e) **Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

No Impact. The Project Site is located in an urbanized area within the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts related to alternative wastewater disposal systems will occur.

7. GREENHOUSE GAS EMISSIONS

The section is based in part on the following item, included as Appendix B of this IS/MND:

B Air Quality, Greenhouse Gases, and Noise Appendices, DKA Planning, November 2015.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHGs are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is retained, warming the atmosphere. This phenomenon is known as the greenhouse effect. GHGs that contribute to the greenhouse effect include:

- Carbon Dioxide (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems.CO_2comprises over 80 percent of GHG emissions in California.[56]

- Methane (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.[57]

- Nitrous Oxide (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N_2O emissions.[58] N_2O emissions from motor vehicles generally occur directly from operation of vehicles.

- Hydrofluorocarbons (HFCs) are one of several high global warning potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.

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[56] *California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 11.*

[57] *United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003).*

[58] *United States Environmental Protection Agency, U.S. Adipic Acid and Nitric Acid N2O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions, December 2001.*

- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.

- Sulfur Hexafluoride (SF_6) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF_6 are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.[59] As shown in Table 3.7-1, the other GHGs are less abundant but have higher GWP than CO_2. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. High GWP gases such as HFCs, PFCs, and SF_6 are the most heat-absorbent.

Table 3.7-1
Global Warming Potential For Greenhouse Gases

Greenhouse Gas	Global Warming Potential Factor(100-Year)
Carbon Dioxide (CO_2)	1
Methane (CH_4)	28
Nitrous Oxide (N_2O)	265
Perfluorocarbons (PFCs)	7,000-11,000
Hydrofluorocarbons (HFCs)	100-12,000
Sulfur Hexafluoride (SF_6)	23,500

Source: California Air Resources Board, First Update to the Climate Change Scoping Plan. May 2014.
Global warning potential measures how much heat a GHG traps in the atmosphere, such as over a 100-year period.

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood

[59] *California Air Resources Board, Climate Change Emission Control Regulations, 2004*

events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to adapt the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy (Strategy) analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change.

Regulatory Setting

International

Kyoto Protocol

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt. The Kyoto Protocol (the "Protocol") is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are

principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11th session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to 3 degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020, acknowledges that $100 billion is needed each year to enable countries to adapt to climate change. The agreement would be signed into law on April 22, 2016 and would require ratification by 55 countries representing 55 percent of emissions.

The Western Regional Climate Action Initiative (WCI)

The Western Regional Climate Action Initiative (WCI) is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The California Air Resources Board's (CARB) planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

Federal

The U.S. Environmental Protection Agency has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHG emissions could be considered within the Clean Air Act's definition of a pollutant.[60] In December 2009, USEPA issued an endangerment finding for GHG emissions under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and USEPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon. In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding $8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants,

[60] *Massachusetts v. Environmental Protection Agency et al (127 S. Ct. 1438 [2007])*

invests in renewable energy sources, calling for adaptation programs, and leading international efforts to address climate change. In September 2013, USEPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants.

Vehicle Standards

Other regulations have been adopted to address vehicle standards including the USEPA and National Highway Traffic Safety Administration (the "NHTSA") joint rulemaking for vehicle standards.

Energy Independence and Security Act (the "EISA")

Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.

2. Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

3. While superseded by NHTSA and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

State

Assembly Bill 1493

California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 was enacted in September 2003 and requires regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by vehicles used for personal transportation.

Executive Order S-3-05

On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The

California Environmental Protection Agency (Cal EPA) formed a Climate Action Team ("CAT") that recommended strategies that can be implemented by state agencies to meet GHG emissions targets.

Assembly Bill 32

In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, CARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[61] On October 25, 2007, CARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexaflouride emissions from the non-electricity sector. CARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO_2 per year and make up 94 percent of the point source CO_2 emissions in California. CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by CARB in coordination with the CAT, was first published in October 2008 (the "2008 Scoping Plan"). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state's dependence on oil, diversify the state's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. As required by AB 32, CARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

In order to assess the scope of reductions needed to return to 1990 emissions levels, CARB first estimated the 2020 "business-as-usual" (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020

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[61] *California Air Resources Board, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.*

BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020. On August 19, 2011, following legal action in opposition to the Scoping Plan, CARB updated the Scoping Plan through a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).[62] CARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.[63] Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent). On May 22, 2014, CARB approved its first update to the AB 32 Scoping Plan, recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 $MMTCO_2e$ 1990 emissions level and 2020 GHG emissions limit would be slightly higher than identified in the Scoping Plan, at 431 $MMTCO_2e$. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the draft first update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 $MMTCO_2e$ (down from 507 $MMTCO_2e$) or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition.

State Bill 1368

Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

SB 97 & CEQA Guidelines

In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor's Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

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[62] *California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011.*

[63] *California Air Resources Board, Greenhouse Gas Inventory – 2020 Emissions Forecast, http://www.arb.ca.gov/cc/inventory/data/forecast.htm. Accessed June 2014.*

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the CARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the CARB's recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

State Bill 375

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.[64]

On October 24, 2008, CARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and

[64] *American Planning Association, California Chapter, Analysis of SB 375, http://www.calapa.org/-en/cms/?2841, accessed March 30, 2009.*

commercial projects). CARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO_2e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, CARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.[65] There is currently no timetable for finalized thresholds. On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.[66] For the area under the Southern California Association of Governments' (SCAG) jurisdiction—including the Project area—CARB adopted Regional Targets for reduction of GHG emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the CARB's Executive Officer approved the final targets.[67] The SCS for the southern California region, including Riverside, Los Angeles, Orange, and San Bernardino counties was prepared by SCAG and approved on April 4, 2012. SCAG's SCS is included in the SCAG 2012-2035 Regional Transportation Plan Sustainable Communities Strategy (the "RTP/SCS"). The RTP/SCS plans to concentrate future development and provide higher intensity development, including residential development, in proximity to transit hubs in order to reduce vehicle miles traveled (VMT) and thereby reduce GHG emissions from personal vehicles. To conduct required modeling analysis for the 2012-2035 RTP/SCS, SCAG distributes the growth forecast to transportation analysis zones (TAZs) to capture localized effects of the interaction of land use and transportation. The TAZ level maps have been developed for the purpose of modeling performance only.[68] The growth and land use assumptions are to be adopted at the jurisdictional level.[69] Further, it is important to note that there is nothing in SB 375 that requires a city's "land use policies and regulations…to be consistent with the regional transportation plan or an alternative planning strategy."[70] The RTP/SCS also includes an appendix listing examples of measures that could reduce impacts from planning, development and transportation.[71] It notes, however, that example measures are "not intended to

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[65] *California Air Resources Board.* http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf

[66] *California Air Resources Board. Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.* http://www.arb.ca.gov/cc/sb375/notice%20of%20decision.pdf

[67] *CARB. 2011. Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.*

[68] *Southern California Association of Governments, 2012-2035 Regional Transportation Plan Sustainable Communities Strategy, p. 124.*

[69] *Ibid.*

[70] *California Gov't. Code §65080(b)(2)(E).*

[71] *Southern California Association of Governments, Final PEIR, 2012-2035 RTP/SCS, Appendix G:* http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf.

serve as any kind of checklist to be used on a project-specific basis." Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State's GHG targets with those set in October 2014 by the European Union and is intended to help the State meets its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs CARB to update the Climate Change Scoping Plan.

Title 24 Energy Efficiency Standards

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations, were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California Green Building Standards

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (the "CCR"), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The updated 2013 CALGreen Code became effective January 1, 2014 and includes new requirements for additions to existing residential and non-residential development.

Regional

South Coast Air Quality Management District Recommendations for Significance Thresholds

The South Coast Air Quality Management District (SCAQMD) convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for

GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of CO_2 equivalent ($MTCO_2e$) as a screening numerical threshold for stationary sources. The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions which recommended a screening threshold of 3,500 $MTCO_2e$ for residential projects, 1,400 $MTCO_2e$ for commercial projects, and 3,000 $MTCO_2e$ for mixed use projects, additionally the Working Group identified project-level efficiency target of 4.8 $MTCO_2e$ per service population as a 2020 target and 3.0 $MTCO_2e$ per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 $MTCO_2e$ and the plan-level target for 2035 was 4.1 $MTCO_2e$. The SCAQMD has not established a timeline for formal consideration of these thresholds.[72] In the meantime, the project level thresholds are used as a non-binding guide; GHG emissions would be considered potentially significant in the absence of mitigation measures. The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which is proposed or required by the Project.

Local

City of Los Angeles

In May 2007, the City released its Green LA Plan that sets a goal to reduce the generation of GHG emissions 35 percent below 1990 levels by 2030. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos. The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.[73] Larger projects must be certified at the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification generally ensures that projects exceed Title 24 (2013) standards by at least 10 percent.[74] The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new non-residential and high-rise residential buildings.

Existing Emissions

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[72] *SCAG, Final PEIR for the 2012-2035 RTP/SCS, Appendix G. Accessible at http://rtpscs, scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf*

[73] *City of Los Angeles, Ordinance No. 179820, added to LAMC as Section 16.10 (Green Building Program).*

[74] *U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 February 26, 2015.*

The Project site includes a 10,659 square foot office building with surface parking. As shown in Table 3.7-2, the majority of emissions are generated from mobile sources that access the commercial uses at the Project Site.

Table 3.7-2

Existing Annual Co_2e Greenhouse Gas Emissions

Scenario and Source	CO_2	CH_4	N_2O	CO_2e
Area Sources	<1	0	0	<1
Energy Sources	92	<1	<1	93
Mobile Sources	123	<1	<1	123
Waste Sources	2	<1	0	5
Water Sources	22	<1	<1	23
Total Emissions	**239**	**<1**	**<1**	**244**

(Metric Tons per Year)

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period. To ensure a conservative estimate, emissions from existing development were not included in the calculation of net emissions increases.

** BAU scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

Source: DKA Planning, 2015.

Construction Phase Impacts on Climate Change

Construction of the 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. These impacts would vary day to day over the 20-month duration of construction activities. As illustrated in Table 3.7-3, construction emissions of CO_2 would peak in 2016, when up to 5,043 pounds of CO_2e per day are anticipated.

Table 3.7-3
Estimated Construction Emissions – Unmitigated

Construction Year	CO_2	CH_4	N_2O	CO_2e
2016	5,028	1	0	5,043
2017	2,604	<1	0	2,613

(Pounds per Day)
Source: DKA Planning 2015, based on CalEEMod 2013.2.2

Bright Line Threshold Approach

The SCAQMD does not have an adopted bright line significance threshold to evaluate GHG impacts. As noted above, however, the SCAQMD recommended (in its tiered approach) a screening criterion of 3,500 metric tonnes/year of CO_2e for mixed use projects. While this recommendation was never formally adopted, this screening criterion provides another point of perspective on the potential significance of a project's GHG emissions, but is not intended to be the sole determination of significance. Instead, it represents a screening tool to identify projects and corresponding GHG emission levels that might trigger another level of GHG analysis. Precisely, if a project exceeds 3,500 $MTCO_2e$/yr screening criteria, the GHG impact analysis can move into Tier 4 of the SCAQMD tiered approach to assess how the project complies with a percent emission reduction target.

The Project would result in 2,372 $MTCO_2e$/yr in operational emissions, a level of gross emissions that would not trigger the SCAQMD's draft screening threshold for mixed-use projects.

Correlated BAU Approach

The analysis in this report uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to evaluating the Project's impact against a GHG significance threshold (i.e., 15.3 percent reduction from BAU). The report's methodology is to compare the Project's emissions as proposed to the Project's emissions if the Project were built using a BAU (or No Action Taken, NAT) approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if it was constructed with project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32.

The May 2014 "First Update to the Climate Change Scoping Plan" calls for a 15.3 percent reduction in 2020 forecast emissions from 509 to 431 million metric tons of CO_2e. These reductions are necessary to achieve the State's objective of ensuring that 2020 emissions meet the 1990 Statewide levels. As shown in Table 3.7-4, these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program.

Table 3.7-4
Emission Reductions Needed to Meet AB 32 Objectives in 2020

Sector	Million Metric Tons of CO_2e Reduction	Percent of Statewide CO_2e Inventory	Summary of Recommended Actions
Energy	-25	-4.9%	Reduce State's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	-23	-4.5%	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy
High Global Warming Potential	-5	-1.0%	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	-2	-0.4%	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Cap and Trade Reductions	-23	-4.5%	Statewide program that reduces emissions from regulated entities through performance-based targets
Total	**-78**	**-15.3%**	

Source: Cal Environmental Protection Agency, "First Update to the Climate Change Scoping Plan." May 2014.

Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the Transportation sector, which is charged with reducing 4.5% of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the sole basis for project-level assessments, this analysis finds that its "business as usual" comparison based on the Scoping Plan is an appropriate reference because the proposed project would contribute to the statewide goals. As noted in Table 3.7-4, there are five key sectors that are the focus of the 78 million metric tons of Statewide emission reductions needed to achieve AB 32's objectives. The proposed project would be consistent with some of these.

- Energy. While the Scoping Plan is focused on Statewide reductions from large industrial facilities that consume energy and on energy conservation, the proposed project would implement substantial reductions that stem from Statewide energy production emissions from the State's renewables

portfolio standard (33% reduction through 2030), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).

- Transportation. The Project's mixed-use nature and location in an existing urban setting provide opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and vehicle miles traveled that no longer are made. Second, it would eliminate many vehicle trips because travel to and from the project site could be captured by public transit and pedestrian travel instead. Finally, it would attract existing trips on the street network that would divert to the proposed uses.

Table 3.7-5
Daily Vehicle Travel Reductions Associated with Project

Land Use	Reduction from Internal Capture	Reduction from Pass-By Trips	Reduction from Transit/Walk-In Trips
Hotel	0%	0%	0%
Specialty Retail	10%	10%	10%
Restaurant	10%	20%	10%
Source: Overland Traffic Consultants, Inc. "Traffic Study for the Tommie Hotel." November 2015.			

As illustrated in Table 3.7-5, the proposed project's profile as an urban infill, mixed-use project with proximity to substantial public transit will produce substantial reductions over land uses that are located in a more typical community that has not coordinated its land use and transportation planning. The projected reductions in vehicle trips and VMT would range from 0-10% for the proposed land uses from internal capture rates alone, with another 0-20% in reductions from pass-by trips, and up to 10% reductions from the substantial mode share from public transit. These would result in concomitant reductions in CO_2e emissions that far exceed the State's AB 32 Scoping Plan goal of a 4.5% reduction from the overall transportation sector by 2020. As such, this analysis concludes that the proposed project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decision-making.

- High Global Warming Potential. The Project would include appliances and other equipment that would utilize refrigerants and other compounds that implement the low-carbon measures instituted by the State to reduce methane and other high-CO_2e compounds.

- Waste. The Project would comply with municipal restrictions on solid waste, solid waste diversion programs, and contribute to overall reductions in waste-related GHG emissions associated with hauling and disposal of organic and non-organic waste.

- Cap and Trade Programs. The Project would not directly be regulated under State cap and trade programs that limit increases in GHG emissions from regulated facilities. However, it would not

obstruct the implementation of this market-based program that seeks to reduce CO_2e emissions over time.

Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments 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).

Greenhouse gas emissions were calculated for long-term operations. As shown in Table 3.7-6, the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 2,370 and 3,477 $MTCO_2e$ per year, respectively, which shows the Project will reduce emissions by 32 percent from the CARB 2020 NAT scenario. The proposed emissions would represent a net 2,128 metric ton increase in annual emissions when accounting for existing emissions from current development. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent). As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant.

The Project will comply with the City of Los Angeles' Green Building Ordinance standards that compel LEED certification, reduce emissions beyond a "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development. The City's checklist is combination of mandatory items, voluntary CalGreen Tier 1 items, and voluntary CalGreen Tier 2 items) for newly constructed non-residential (and high rise residential) buildings is part of LAMC Section 99.12.508:[75]

1. **GHG Emissions Associated with Planning and Design.** The Project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings.

2. **GHG Emissions Associated with Energy Demand.** The Project must meet Title 24 2008 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities.

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[75] *LAMC Section 99,12.508: http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc*

3. **GHG Emissions Associated with Water Use.** The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use.

4. **GHG Emissions Associated with Solid Waste Generation.** The Project is subject to construction waste reduction of at least 50 percent. In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. **GHG Emissions Associated with Environmental Quality.** The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities.

Table 3.7-6

Estimated Annual Co_2e Greenhouse Gas Emissions

Scenario and Source	Business As Usual Scenario*	As Proposed Scenario	Reduction from Business As Usual Scenario	Change from Business as Usual Scenario
Area Sources	<1	<1	-	0%
Energy Sources	922	535	-387	-42%
Mobile Sources	2,409	1,691	-718	-30%
Waste Sources	71	71	-	0%
Water Sources	55	55	-	0%
Construction	19	19	-	0%
Total Emissions	3,477	2,372	-1,105	-32%

(Metric Tons per Year)

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period. To ensure a conservative estimate, emissions from existing development were not included in the calculation of net emissions increases.

** BAU scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

Source: DKA Planning, 2015.

The Project is an infill development that reuses a developed site and increases the density (FAR). Thus, the Project provides a more efficient use of the land per acre, especially in an area with transit opportunities. There would be bicycle parking, a Low Impact Development plan (LID) for runoff potential, and all vehicle parking will be on-site in an integrated garage. The lighting would be designed to reduce light pollution and intrusion to the nearby residential area. The Project Site is near a transit corridor near Sunset Boulevard and Vine Street, and within walking distance of Metro Rail and DASH buses. The Project would meet Title 24 energy standards and all City of Los Angeles Green Building Codes. This would reduce water usage through efficient fixtures. Landscaping is expected to be minimal given the size constraints at ground level. Demolition, construction, and operation will recycle materials to the extent feasible.

It is important to note that the CO_2 estimates from mobile sources (particularly CO_2, CH_4, and N_2O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (e.g., commuting, shopping) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

b) Would the project conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The Project would contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted earlier, the Project would be consistent with a number of relevant plans and policies that govern climate change. In particular, the Project is consistent with the State's Executive Order S-3-05, which calls for reducing GHG emissions statewide to 1990 levels, including 15 percent reductions by 2020. In addition, the Project is consistent with SCAG's 2012-2035 RTP/SCS, which calls for regional growth and transportation emissions to be consistent with regional and State air pollution objectives. With regard to local policies and regulations, the Project will comply with the City of Los Angeles' Green Building Ordinance standards that compel LEED certification and reduce emissions beyond a BAU scenario. The AB 32 Scoping Plan provides the basis

for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. As a result, the Project is judged against its consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. As shown in Table 3.7-7, the Project would be consistent with all feasible and applicable strategies recommended in the Scoping Plan. As a result, the Project's cumulative impact on climate change is considered less than significant.

Table 3.7-7
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	**Not Applicable.** The statewide program is not relevant to the Project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Not Applicable.** The development of standards is not relevant to the Project.
Energy Efficiency. Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent.** The Project will be required to be constructed in compliance with the standards of Title 24 that are in effect at the time of development. In addition, with compliance with the City's Green Building Ordinance, the Project will exceed Title 24 standards.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	**Consistent.** The Project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Not Applicable.** The statewide program is not relevant to the Project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	**Not Applicable.** The development of regional planning goals is not relevant to the Project.
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not Applicable.** State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Neutral.** The Project may or may not include solar roofs.
Medium/Heavy-Duty Vehicles. Adopt medium and	**Not Applicable.** State agencies are responsible for

Table 3.7-7
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
heavy-duty vehicle efficiency measures.	implementing efficiency measures.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	**Not Applicable.** This measure addresses industrial facilities. The Project is not an industrial facility.
High Speed Rail. Support implementation of a high speed rail system.	**Not Applicable.** This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The Project will be compliant with the City's Green Building Ordinance, and would incorporate water saving features and energy efficient features into its design.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	**Not Applicable.** State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** Under City of Los Angeles requirements, the Project would divert/recycle at least 50% of construction debris, re-use existing materials in new construction, use recycled content materials; and recycle during operation.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not Applicable.** Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent**. The Project will be compliant with the City's Green Building Ordinance, would incorporate water saving features and energy efficient fixtures into its design.
Agriculture. In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not Applicable.** The Project does not include agricultural facilities.

Source: DKA Planning, 2015.

8. HAZARDS AND HAZARDOUS MATERIALS

This section is based on the following items, included as Appendix E of this IS/MND:

E Phase I Environmental Site Assessment, Partner Inc., June 18, 2014.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban mixed-use project. All of these materials would be used temporarily during construction. Thus, construction of the Project does not involve the routine transport, use, or disposal of hazardous materials.

Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Finally, the construction activities are contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards. Potential impacts associated with the potential release of hazardous substances during construction of the Project would be less than significant.

Similarly, from an operational perspective, the Project does not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of hotel and commercial uses. These typical urban uses do not involve the routine use of hazardous materials. Instead, the operation of the Project has limited hazardous materials similar to any other urban development. For example, the proposed uses would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping. Other uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. The Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project Site, creates a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction

measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. In addition, the Project will comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. Therefore, potential impacts associated with operation of the Project would also be less than significant.

The transport of hazardous materials and wastes (i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils) would occur in accordance with federal and state regulations, including the Federal Resource Conservation and Recovery Act (RCRA), Title 49 of the Code of Federal Regulations (CFR), the California Vehicle Code, and the California Health and Safety Code. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Therefore, potential impacts associated with the minimal transport of any hazardous materials would also be less than significant.

b) Would the project create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant With Mitigation Incorporated. A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

Asbestos-Containing Materials

Due to their age, there is a potential for asbestos-containing materials (ACM) to be present. The ACM are required to be removed by a California Licensed Asbestos Abatement Contractor prior to demolition. The following federal, state, and local regulations require that any identified ACM that will be disturbed by renovation activities shall be removed from the building prior to demolition or renovation and that written notification be provided to contractors and other effected parties.

1. The Federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) for building demolition and renovation applies to facilities that contain more than 260 linear feet or 160 square feet and requires that asbestos-containing building materials be removed prior to demolition or renovation.

2. The California Health and Safety Code Chapter 10.4 requires that any owner of a commercial or industrial building provide written notice to their employees, tenants and contractors about the presence of asbestos in the building within 15 days of receipt of such knowledge. Any contractor that receives such notice is required to provide a copy to each of its employees.

3. South Coast Air Quality Management District Rule 1403 requires written notification 10 working days prior to the demolition of any structure and that all friable and non-friable asbestos-containing building materials be removed prior to demolition by a State of California licensed Asbestos Abatement Contractor.

Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. However, with compliance with the federal (NESHAP), state (California Health Code Chapter 10.4), and local regulations (SCAQMD Rule 1403) for ACM (see regulatory compliance measure below), the impact would be less than significant.

Lead-based Paint

Due to their age, there is a potential for lead-based paint to be present. Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. However, with regulatory compliance measure below, the impact would be less than significant.

PCB Equipment

The on-site reconnaissance addressed indoor and outdoor transformers that may contain Polychlorinated biphenyls (PCBs). One padmounted transformer was observed on the Site. The transformer is not labeled indicating PCB content. No staining or leakage was observed in the vicinity of the transformer. LADWP maintains ownership and operational responsibility for the transformer and that the unit does not contain PCBs. Based on the good condition of the equipment, the transformer is not expected to represent a significant environmental concern. No other potential PCB-containing equipment (interior transformers, oil-filled switches, hoists, lifts, dock levelers, hydraulic elevators, balers, etc.) was observed on the Site.[76] In addition, with regulatory compliance measure below, the impact would be less than significant.

Methane

The Site is not within a Methane Zone or Methane Buffer Zone.[77]

Conclusion of the Phase I ESA[78]

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[76] *Phase I Environmental Site Assessment, Partner Inc., June 18, 2014.*

[77] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/*

[78] *Phase I Environmental Site Assessment, Partner Inc., June 18, 2014.*

According to available historical sources, the Project Site was formerly vacant land from at least 1907 to at least 1913; developed residentially from at least 1919 to at least 1957; developed for residential and commercial use from 1958 to at least 1976; and developed for commercial use from at least 1981 to present. Former tenants on the Site have included various residential and commercial tenants since at least 1919 to present.

A recognized environmental condition (REC) refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

- Partner did not identify any recognized environmental conditions during the course of its assessment.

A controlled recognized environmental condition (CREC) refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. The following was identified during the course of the assessment:

- Partner did not identify any controlled recognized environmental conditions during the course of its assessment.

A historical recognized environmental condition (HREC) refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The following was identified during the course of the assessment:

- Partner did not identify any historical recognized environmental conditions during the course of its assessment.

An environmental issue refers to environmental concerns identified by Partner, which do not qualify as RECs; however, warrant further discussion. The following was identified during the course of its assessment:

- Due to the age of the subject property building, there is a potential that asbestos-containing materials (ACMs) are present. Overall, all suspect ACMs were observed in good condition and do not appear to pose a health and safety concern to the occupants of the Site at this time.

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of 1400 North Cahuenga Boulevard. The assessment has revealed no evidence of recognized environmental conditions in connection with the Site; however,

environmental issues were identified. Based on the conclusions of this assessment, Partner recommends the following:

1. An Operations and Maintenance (O&M) Program should be implemented in order to safely manage the suspect ACMs located at the Site.

2. The identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants.

The Phase I had 2 recommendations. Recommendation 1 is not applicable because the building on the Site would be demolished as part of the Project. Thus an operations and maintenance program would not be appropriate. Recommendation 2 would be satisfied with SCAQM Rule 1403 for asbestos, as identified below. The Project shall comply with the following regulatory compliance measure and impacts will be less than significant.

Regulatory Compliance Measure

Explosion/Release (Existing Toxic/Hazardous Construction Materials)

- (**Asbestos**) 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 Asbestos-Containing Materials (ACM) 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.

- (**Lead Paint**) Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint 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.

- (**Polychlorinated Biphenyl – Commercial and Industrial Buildings**) Prior to issuance of a demolition permit, a polychlorinated biphenyl (PCB) abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile (1,325 feet) of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The nearest school is: [79]

- Arshag Dickranian Armenian School, 1200 Cahuenga Boulevard, approximately 1,100 feet south.

However, the Project will have a less than significant impact during construction (with regulatory compliance measures for asbestos, lead-based paint, PCBs) and will not emit any hazardous substances during operation. The school would still be generally shielded from the Project Site by the distance and intervening residential and commercial buildings between the school and the Site. Therefore, impacts of hazardous materials within one-quarter mile of a school will be less than significant.

d) Would the project 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?

Less Than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the Project Site is included on any of the above referenced lists and would therefore pose an environmental hazard to the public or the environment. In meeting the provisions in Government Code Section 65962.5, commonly referred to as the "Cortese List," database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency.

According to EnviroStor, there are no cleanup sites, permitted sites, LUFTs (Leaking Underground Storage Tanks), or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site. There is an identified LUFT (leaking underground fuel tanks) for 1355 Cahuenga Boulevard (Fire Station #27), approximately 250 feet south of the Site, with case number 900120098[80]. The cleanup was completed and the case closed on 6/13/1997.[81]

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[79] *Navigate LA, Schools Layer: http://navigatela.lacity.org/navigatela/*

[80] *California Department of Toxic Substance Control, EnviroStor, website: http://www.envirostor.dtsc.ca.gov/public/, August 26, 2015.*

[81] *http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603700508*

According to GeoTracker, there are no other cleanup sites, land disposal sites, military sites WDR sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.[82] There is an identified LUST cleanup site at 1355 Caheunga, which is the case referred above and was closed on 6/13/1997. In addition, there are permitted underground storage tanks located in facilities nearby the Project. As permitted USTs, these are assumed to comply with all regulations to ensure safety and lack of environmental impact.

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.[83] There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.[84] The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.[85]

The Phase I conducted a regulatory database search and the Site was not listed on any database, except the following: [86]

- According to records reviewed, the Site is identified as The Post Group at 1400 Cahuenga Avenue in the HWTS database under EPA ID No. CAL000117057. This facility was listed as inactive on June 30, 1998. No other pertinent information is provided.

- The Site is identified as NT Audio Labs Inc. at 1400 Cahuenga Avenue under EPA ID No. CAC002558154. This site generated 58.996 tons of asbestos-containing waste in 2002. The facility was listed as inactive on August 19, 2003. No other pertinent information is provided.

- Additionally, the Site is identified as Granite Prospects LLC at 1400 Cahuenga Boulevard under EPA ID No. CAC002563861. This site generated 2.107 tons of asbestos-containing waste in 2003. The facility was listed as inactive on October 2, 2003. No other pertinent information is provided.

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82 *California State Water Resources Control Board, GeoTracker, website: http://geotracker.waterboards.ca.gov/map, August 26, 2015.*

83 *California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf, August 26, 2015.*

84 *California Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: http://www.calepa.ca.gov/sitecleanup/corteselist/, August 26, 2015.*

85 *California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities, August 26, 2015.*

86 *Phase I Environmental Site Assessment, Partner Inc., June 18, 2014.*

As stated, these facilities are now listed as inactive. No impact would occur.

The adjacent properties to the south were identified as a EDR Historical Auto Station sites; to the southwest as a LUST, CA FID UST, Historic UST, SWEEPS UST, and a Historic Cortese site; and to the west as an EDR US Historical Auto Station site in the regulatory database report, as discussed below: [87]

- The property, identified as Armans Auto Repair at 1349 Ivar Avenue and 1350 North Cahuenga Boulevard, is located adjacent to the south (hydrologically down-gradient) of the Project Site. This facility is listed as an auto repair from at least 2005 to 2012. No other pertinent information is provided. Based on the lack of a documented release or violation and the inferred direction of groundwater flow, this listing is not expected to represent a significant environmental concern.

- The property, identified as Fire Station #27 at 1355 North Cahuenga Boulevard, is located adjacent to the southwest (hydrologically cross- to down-gradient) of the Project Site. This facility was permitted one gasoline UST and one diesel UST. This site reported a release of gasoline on August 25, 1988, which reportedly impacted an aquifer used for drinking water supply. The cause of release is not listed and was reported to the lead agency (Los Angeles RWQCB Region 4) in 1988. Remedial actions included groundwater monitoring. The responsible party is identified as the City of Los Angeles DPW, and regulatory closure was obtained on June 13, 1997. Based on the regulatory closure and the inferred direction of groundwater flow, this listing is not expected to represent a significant environmental concern.

- The property, identified as Stepans Automotive at 1425 North Cahuenga Boulevard, is located adjacent to the west (hydrologically cross-gradient) of the Project Site. This site is listed as an automotive shop from at least 1999 to at least 2012. No other pertinent information is provided. Based on the lack of a documented release or violation and the inferred direction of groundwater flow, this listing is not expected to represent a significant environmental concern.

The properties to the southeast are identified as a SLIC sites in the regulatory database report, as discussed below: [88]

- The property, identified as Paragon Cleaners at 1310 Vine Street, is located approximately 0.18-miles to the southwest of the Project Site, and situated hydrologically down-gradient. This site reported a release of tetrachlorothylene (PCE) on October 14, 2005, which reportedly impacted an aquifer used for drinking water. The release occurred as a result of dry cleaning operations and was reported to the lead agency (Los Angeles RWQCB Region 4) in 1995. The responsible party is identified as Paragon Cleaners, and remediation is currently ongoing. According to a site investigation report (Iris

[87] *Phase I Environmental Site Assessment, Partner Inc., June 18, 2014.*

[88] *Phase I Environmental Site Assessment, Partner Inc., June 18, 2014.*

Environmental 2008), this site has operated as a dry cleaners with two machines using PCE from 1961 to 2006. Currently, the dry cleaners uses "green" chemical and PCE is no longer stored onsite. Remedial activities include groundwater monitoring and sampling for VOCs, PCE, and trichloroethylene (TCE). Based on the ongoing remediation, regulatory oversight, and the inferred direction of groundwater flow, this listing is not expected to represent a significant environmental concern and it is unlikely that a regulatory file review for this site would alter the findings of the Phase I.

- The property, identified as Fountain-Vine Plaza at 1253 North Vine Street, is located approximately 0.17-mile to the southeast of the Project Site, and situated hydrologically down-gradient. This site reported a release of gasoline, PCE, and TCE on January 23, 2006, which reportedly impacted soil only. The release occurred as a result of a former gas station and a former dry cleaners located on the southwest corner of Fountain Avenue and Vine Street and was reported to the lead agency (Los Angeles RWQB Region 4) in 2006. The responsible party is not identified, and remediation is currently ongoing. Remedial activities include soil sampling and groundwater monitoring. Based on the ongoing remediation, regulatory oversight, and the inferred direction of groundwater flow, this listing is not expected to represent a significant environmental concern and it is unlikely that a regulatory file review for this site would alter the findings of the Phase I.

As shown, the Project Site is not located on a list of hazardous material sites or active sites. Therefore a less than significant impact will occur.

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 for people residing or working in the project area?

No Impact. The Project is not within an airport hazard area.[89] The Project Site is not located within two miles of a public airport. The nearest airports are Los Angeles International Airport (LAX) located 11 miles southwest, Santa Monica Airport located 9 miles southwest, Bob Hope-Burbank Airport located 7.5 miles north. Therefore no impact would occur.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. There are no nearby private airstrips. Therefore, no impacts will occur.

[89] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/*

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. Construction of the Project will not substantially impede public access or travel on public rights-of-way such as Cahuenga Boulevard, De Longpre Avenue, and Ivar Avenue, and would not interfere with any adopted emergency response plan or emergency evacuation plan. The City's Critical Facilities and Lifeline Systems show selected disaster routes, emergency facilities, depend care facilities and other important infrastructure.[90] No facilities are located nearby the Site. Environmental impacts may nevertheless result from Project implementation due to possible interference with an emergency response plan. However, these potential impacts will be mitigated to a less than significant level by **Mitigation Measure 8-1**. Therefore, impacts would be less than significant after mitigation.

Mitigation Measure

8-1 Emergency Evacuation Plan

Prior to the issuance of a building permit, the applicant shall develop an emergency response plan in consultation with the Fire Department. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone,[91] nor does the Project Site contain any wildlands fire hazard terrain.[92] Therefore, no impacts will occur.

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[90] *Los Angeles Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

[91] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/.*

[92] *Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

9. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements.[93] Requirements of the SUSMP are enforced through the City's plan approval and permit process.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. It is an ordinance passed in 2011 amending LAMC 64.70 (the City's stormwater code) and expanding on the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP because it requires a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures. All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. A project must comply with the LID Best Management Practices (LID BMPSs)

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[93] *Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities*; Retail gasoline outlets"; Restaurants* Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/*

(determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply.

Construction

Construction activities associated with the Project are subject to City inspection and implementation of storm water BMPs. Since the construction of the Project will not disturb greater than one acre of land (the total site area is 0.464 acres)[94], the Project Applicant will not be required to obtain coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).[95] Construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LID requirements. The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. The Project shall comply with the following regulatory compliance measures. Therefore, impacts related to water quality will be less than significant.

Regulatory Compliance Measures

National Pollutant Discharge Elimination System General Permit

Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for Phase 1 of the proposed Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan shall be prepared and implemented for the proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

Low Impact Development Plan

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[94] *See Section 2, Project Description.*

[95] *California Environmental Protection Agency, State Water Resources Control Board, Storm Water Program, Construction Storm Water Program, website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml, August 26, 2015.*

Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

Development Best Management Practices

The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

Operation

The Project would not include industrial discharge to any public water system. Under existing conditions, runoff at the Project Site may contain typical urban pollutants such as automotive fluids (including oil and grease) commercial cleaning and landscaping pollutants discharged into the storm drainage system. Because there would be no substantial increase in runoff as a result of the Project (which would continue to have automobiles, and typical cleaning elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type than that which currently exists. The Project would be required to submit site drainage plans to the City Engineer and other responsible agencies demonstrating compliance with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles and the State Water Resources Control Board (SWRCB) for review and approval prior to development of any drainage improvements. The Project operation is also required to comply with LID requirements. In addition, design criteria as established in the SUSMP would be incorporated into the Project to minimize the off-site conveyance of pollutants. Therefore, operation-related impacts to water quality would be less than significant.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

No Impact. A significant impact may occur if a project includes excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The nearest surface water in the vicinity is the Hollywood Reservoir, approximately 1.5 miles north of the Project Site. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site or nearby. A public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Project Site.

The sources of public water for the City of Los Angeles are surface water from California Water Project and Colorado River purchased through the Metropolitan Water District (MWD) and groundwater.[96] The Project Site is located in an urbanized area of the City. The Project Site is currently developed with a building and surface parking. The Project will cover the entire site with a building. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge. Therefore, the Project will have no impact with respect to groundwater supplies or recharge.

No active surface groundwater seeps or springs were observed on the Site. The subsurface exploration did encounter groundwater at the depth of 49 feet. Based on the Seismic Hazard Zone Report by the California Geological Survey (formerly Division of Mines and Geology), the depth to historical high groundwater level is about 48 feet below the surface. Seasonal fluctuations of groundwater levels may occur by varying amounts of rainfall, irrigation and recharge.[97] The Project would require excavation for subterranean levels (approximately 25 feet). Since the observed groundwater and historic high groundwater would not be close to the depth of excavation, no issue with respect to groundwater is anticipated. Therefore, no impact will occur.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. Surface water at the site consists of direct precipitation onto the property. Much of this water drains as sheet flow down descending slopes to low-lying areas, offsite and/or to the street. The existing building has not been provided with roof gutters and downspouts. No area drains and/or subdrain outlet pipes were observed on the Site.[98] The Project Site is also not near, nor would it be altering, a stream or river. However, because the proposed building size and layout would differ as compared to the existing building, the Geotechnical Engineering Investigation includes recommendations for drainage and maintenance[99] This is included as **Mitigation Measure 6-1**, above. Therefore, impacts will be less than significant.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase

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[96] *LADWP, Water, Sources of Water: https://www.ladwp.com/, August 26, 2015*

[97] *Page 2, Geotechnical Engineering Investigation, December 17, 2014.*

[98] *Page 2, Geotechnical Engineering Investigation, December 17, 2014.*

[99] *Page 13, Geotechnical Engineering Investigation, December 17, 2014.*

the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. No flooding is expected to occur on- or off-site due to the relatively flat grades of the Project Site and the vicinity. The Project Site is also not near, nor would be altering, a stream or river. Therefore, impacts related to site drainage and flooding will be less than significant.

e) Would the project 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 Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving a Project Site. A Project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. No natural watercourses exist on or in the vicinity of the Project Site.

The storm drain system includes catch basins at the southwest corner of De Longpre Avenue and Cahuenga Boulevard. The catch basins are linked by a 15-inch collector RCP (reinforced concrete pipe) to an 54-inch collector reinforced concrete arch. The flow is west along De Longpre Avenue and south along Cahuenga Boulevard.[100] Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 9(a), the Project is required to comply with the NPDES program, LID Best Management Practices, as well as the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants.

Construction

Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination. Two general strategies are recommended to prevent construction

[100] *Navigate LA, Stormwater Information: http://navigatela.lacity.org/navigatela/*

silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. When properly designed and implemented, these "good-housekeeping" practices would reduce short-term construction-related impacts to a less than significant level by controlling dust and erosion that may occur onsite and leaks from any construction equipment. The project is required to comply with the City of Los Angeles' Low Impact Development (LID) Best Management Practices (BMPs), which are determined on a case by case basis by the Department of Public Works. Approval for development project and building/grading permits will not be granted or issued until appropriate and applicable stormwater BMPs are incorporate into the project design plans.

Operation

The Site is currently developed with a building and surface parking. The Project will not result in a substantial change in the amount of impervious surface area at the Project Site, and would therefore not be anticipated to result in an increase in stormwater runoff from the Project Site. Activities associated with Project operation will not generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking area could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, there is already surface parking on the Project Site so no different type of potential pollutants would occur. In addition, impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and cities in Los Angeles County, would be incorporated to minimize off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for operational water quality impacts to a less than significant level.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Other than the sources described in the response to Question 9(e), the Project does not include other sources of contaminants that could substantially degrade water quality. Therefore, impacts to water quality would be less than significant.

g) Would the project 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?

No Impact. This question would apply to the Project only if it were placing housing in a 100-year flood

zone. The Project does not include housing units and it would not be located in a 100-year flood hazard area according to the Los Angeles Safety Element map.[101] Therefore, the Project will not place housing within a 100-year flood hazard area and no impact related to this issue would occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows. According to the Federal Emergency Management Agency (FEMA) the Flood Insurance Rate Map (FIRM) indicates that the Project Site is located outside the flood zone.[102] Additionally, the Project Site is not located within a City-designated 100- or 500-year floodplain.[103] Therefore, the Project will not be at risk of flooding and would not place structures in an area that would impede or redirect flood flows. No impacts to flood flows would occur.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. The nearest surface water in the vicinity is the Hollywood Reservoir created by the Mulholland Dam, approximately 1.5 north of the Project Site. The Project Site, and much of the Hollywood area, is located within a potential inundation area.[104] However, the result of the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing facilities. None of the 13 dams in the greater LA area was severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake.[105]

The LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety

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[101] *Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles:* http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

[102] *FEMA, Flood Insurance Rate Maps, DFIRM 06037C1605F:* https://msc.fema.gov/portal, *August 26, 2015.*

[103] *Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles:* http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

[104] *Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map:* http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

[105] *Page II-16, Los Angeles Safety Element,* http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.

of Dams (DSOD). [106] DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures in order to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at seepage drains, and performing a thorough visual inspection. Many LADWP reservoirs have Movement and Settlement (M&S) survey points installed on, and near, the dams. These points are periodically measured using precision survey equipment. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. At least once per year, State DSOD inspectors accompany LADWP Reservoir Surveillance personnel into the field to inspect each dam and reservoir. The Water System's Geotechnical Engineering Group maintains a program for periodically analyzing its dams and reservoirs for earthquake safety.[107] Therefore, the Hollywood Reservoir and Mulholland Dam, as with other dams in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus the minimal risk of flooding from potential dam or levee failure will not be exacerbated by the development of the Project. Impacts related to flooding will be less than significant.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A significant impact may occur if a Project Site is sufficiently close to the ocean or other water body to be potentially at risk for the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. The nearest surface water in the vicinity is the Hollywood Reservoir created by the Mulholland Dam, approximately 1.5 miles of the Project Site. Mitigation of potential seiche action has been implemented by the LADWP through regulation of the level of water in its storage facilities and providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.[108] The Project Site

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[106] *http://www.water.ca.gov/damsafety/*

[107] *LADWP, Water System Reservoir Surveillance Program: http://eng.lacity.org/projects/fmp/pdf/handout4_042009.pdf*

[108] *Page II-16, Los Angeles Safety Element, http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

is not located within an area potentially impacted by a tsunami, which is typically located along the coast of the Pacific Ocean.[109] The Project Site is not within a Hillside Area.[110] In addition, the City of Los Angeles ZIMAS mapping system [111] and the Safety Element of the City of Los Angeles [112] do not classify the Project Site as within a landslide area, or identified as a bedrock or probably bedrock landslide site. The hillside area generally includes the Hollywood Hills, north of Franklin Avenue. Small areas (5-100 acres) of bedrock landslide sites are located in central Griffith Park. Further, according to the State of California Seismic Hazards Map[113], the Project Site is not at risk for landslides.[114] Thus, there is no potential for mudflow. Therefore, development of the Project will not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Impacts related to tsunamis, seiches, and mudflow will be less than significant.

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[109] *Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

[110] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/.*

[111] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/.*

[112] *Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, August 26, 2015.*

[113] *California, Department of Conservation, Landslide Maps: http://www.quake.ca.gov/gmaps/WH/landslidemaps.htm, August 26, 2015.*

[114] *Landslide Inventory Map of the Hollywood Quadrangle, California Geological Survey, April 2013: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/lsim/LSIM_Hollywood.pdf, August 26, 2015.*

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community. The Project Site is comprised of a portion of one City block surrounded by existing boundaries (roads and alley). The Project is not of a scale or nature that could physically divide an established community. The Project is not affecting any right-of-ways. The Project would be built on an existing urban infill site currently improved with structures. As such, no impact related to physical division of an established community will occur.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate. The legal standard that governs consistency determinations is that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan.[115] The following is a list of applicable plans:

Regional Level

- *Southern California Association of Governments*

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[115] *See Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 717-18 [upholding a city's determination that a subdivision project was consistent with the applicable general plan]). As the Court explained in Sequoyah, "state law does not require an exact match between a proposed subdivision and the applicable general plan." To be "consistent" with the general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning, the project must be "in agreement or harmony with the applicable plan." (see also Greenebaum v. City of Los Angeles (1984) 153 Cal.App.3d 391, 406; San Franciscans Upholding the Downtown Plan, supra, 102 Cal.App.4th at p. 678.) Further, "[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (Friends of Lagoon Valley v. City of Vacaville (2007) 154 Cal.App.4th 807, 817.) Courts also recognize that general plans "ordinarily do not state specific mandates or prohibitions," but instead provide "policies and set forth goals." (Friends of Lagoon Valley.*

- *Regional Comprehensive Plan and Guide (RCPG)*
- *Compass Blueprint*
- *Regional Comprehensive Plan (RCP)*
- *Regional Transportation Plan (RTP)*

- *South Coast Air Quality Management District's (SCAQMD)*
  - *Air Quality Management Plan (AQMP)*
- *Los Angeles County Metropolitan Transportation Authority's (Metro)*
  - *Congestion Management Plan (CMP) for Los Angeles County.*

City of Los Angeles

- *City of Los Angeles General Plan*
- *1988 Hollywood Community Plan*[116]
- *ZI-2433 Revised Hollywood Injunction*[117]
- *ZI-2374 Los Angeles State Enterprise Zone*
- *ZI-1352 Hollywood Redevelopment Project Area*

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[116] *Until recently, the Project Site was subject to the Hollywood Community Plan Update (HCP Update), which was adopted by City Council on June 19, 2012.*[116] *On December 10, 2013, the Superior Court of California issued a tentative ruling that the HCP Update and accompanying EIR were not legally adequate and should be invalidated.*[116] *On February 11, 2014 the court ordered a preemptory writ of mandate that the City take the necessary steps to rescind, vacate, and set aside all actions approving the HCP Update, the certified EIR and any and all actions that derive from the HCP Update. The court also enjoined the City from granting any authority, permits or entitlements that derive from the HCP Update or the EIR. On April 2, 2014, the City Council adopted Ordinance No. 182960 to comply with the court's order. Therefore, the HCP Update has been rescinded and invalidated. By operation of law, the 1988 Community Plan (1988 HCP), in conjunction with the applicable provisions of the Los Angeles Municipal Code (LAMC) guide the land use and zoning on the Project Site, respectively.*

[117] *ZI-2433 became effective on February 18, 2014 in response to the LA County Superior Court's injunction prohibiting the City from granting any authority, permits, or entitlements which derive from the HCP Update or its EIR.* http://zimas.lacity.org/documents/zoneinfo/ZI2433.pdf

- *ZI-2277 Hollywood Redevelopment Project Area*
- *Los Angeles Municipal Code*

Consistency with Regional Plans

Southern California Association of Governments (SCAG)

Regional Comprehensive Plan and Guide (RCPG)

The RCPG was adopted in 1996 by the member agencies of SCAG to set broad goals for the Southern California region, with the exception of the County of San Diego, and to identify strategies for agencies at all levels of government to use in guiding their decision-making. The RCPG identifies significant issues and changes that can be anticipated by the year 2015 and beyond. Adopted policies related to land use are contained primarily in the Growth Management chapter of the RCPG. The primary goal of the Growth Management chapter is to address issues related to growth and land use by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources, and enhance the quality of life in the region. SCAG uses the criteria in CEQA Guidelines, Section 15206 to define what a regionally significant project is:

1. A proposed local general plan, element, or amendment thereof for which an EIR was prepared.
2. A proposed residential development of more than 500 dwelling units.
3. A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
4. A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.
5. A proposed hotel/motel of more than 500 rooms.
6. A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.
7. A project that would result in the cancellation of a Williamson Act Contract for any parcel of 100 or more acres.
8. A project for which an EIR was prepared and which is located in and substantially impacting an area of critical environmental sensitivity. This includes the California Coastal Zone.
9. A project that would substantially affect sensitive wildlife habitats such as riparian lands, wetlands, bays, estuaries, marshes, and habitats for rare and endangered species.

10. A project that would interfere with the attainment of regional water quality standards as stated in the approved areawide wastewater management plan.

11. A project that would provide housing, jobs, or occupancy for 500 or more people within 10 miles of a nuclear power plant.

12. A project that has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located.

The Growth Management chapters overall goals are to:[118]

- re-invigorate the region's economy,
- avoid social and economic inequities and the geographical dislocation of communities, and
- to maintain the region's quality of life.

While the Project is not of the scale to be considered regionally significant based on the criteria above, the Project will nevertheless be consistent with, or not interfere with implementation of, the goals of the Growth Management Chapter of the RCPG. The Project would include a hotel and retail use to provide additional jobs, revenue, and economic activity in the area. The Project would not dislocate a community or increase social or economic inequalities. The Project would include a hotel use near similar compatible uses, such as offices and entertainment options in Hollywood.

Sustainability Planning Grant Program

The Sustainability Planning Grant Program (formerly known as Compass Blueprint Grant Program) was established as an innovative vehicle for promoting local jurisdictional efforts to test local planning tools. Since starting in 2005, 133 projects have been completed through the program, with another 69 projects to be completed by the end of 2016.[119] The Project is not listed as one of the projects in the program.

Regional Comprehensive Plan (RCP)

SCAG's 2008 RCP is a guidance document that was developed in response to the Regional Council directive in the 2002 Strategic Plan to develop a holistic, strategic plan for defining and solving the region's inter-related housing, traffic, water, and air quality challenges. The RCP incorporates input from

[118] *SCAG, RCPG Growth Management Chapter, page 3-1: http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGGrowthManagementChapter.pdf*

[119] *Sustainability Planning Grant Program: http://sustain.scag.ca.gov/Pages/Grants%20and%20Local%20Assistance/GrantsLocalAssistance.aspx.*

the RCP Task Force, SCAG's policy committees and subregions, local governments, and other key stakeholders. RCP defines a vision for the SCAG region that includes balancing resource conservation, economic vitality, and quality of life. It also provides a long-term planning framework that describes comprehensive responses to growth and infrastructure challenges and recommends an Action Plan targeted for the year 2035. The RCP does not mandate integrated resources planning; however, SCAG does request that local governments consider the recommendations set forth on the RCP in their General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions. The RCP is an advisory document that contains policies that apply to public and/or private sectors. Public sector includes SCAG, local and state governments, transportation commissions, and resource agencies and conservation groups. Many of the policies apply to SCAG and the public sector, and are intended to inform how SCAG and governments should work to integrate growth and land use planning. The RCP policies are organized in the following categories: Land Use and Housing, Open Space and Habitats, Water, Energy, Air Quality, Solid Waste, Transportation, Security and Emergency Preparedness, and Economy. Table 3.10-1, SCAG Regional Comprehensive Plan, lists the policies that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) policies of the Regional Comprehensive Plan.

Regional Transportation Plan (RTP)

On April 4, 2012, SCAG adopted the 2012-2035 Regional Transportation Plan (RTP). The Sustainable Communities Strategy (SCS) is a required element of the RTP. The RTP is a blueprint for making better transportation and land use choices for the future and supporting those choices with wise investments. The RTP is intended to result in more and better travel choices as well as safe, secure, and efficient transportation systems that provide improved access to opportunities, such as jobs, education, and healthcare for our residents. Furthermore, the RTP is intended to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for the region's 22 million residents by 2035. The RTP is built on the vision of mobility, economy, and sustainability.[120] The RTP contains goals and policies that are directed to transportation planners and decision-makers. They apply to regionally significant project, of which the Project is not. Nonetheless, they are provided below:

Goals

1. Align the plan investments and policies with improving regional economic development and competitiveness.

2. Maximize mobility and accessibility for all people and goods in the region.

3. Ensure travel safety and reliability for all people and goods in the region.

[120] *SCAG, RTP: http://rtpscs.scag.ca.gov/Pages/default.aspx*

4. Preserve and ensure a sustainable regional transportation system.

5. Maximize the productivity of our transportation system.

6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).

7. Actively encourage and create incentives for energy efficiency, where possible.

8. Encourage land use and growth patterns that facilitate transit and non-motorized transportation.

9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.

Policies

1. Transportation investments shall be based on SCAG's adopted regional Performance Indicators.

2. Ensuring safety, adequate maintenance, and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.

3. RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.

4. Transportation demand management (TDM) and non-motorized transportation will be focus areas, subject to Policy 1.

5. HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.

6. Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.

Applicability of SCAG Plans

The goals and policies of the RCPG, Sustainability Program, RCP, and RTP address projects considered to be regionally significant. To monitor regional development, CEQA requires regional agencies, such as SCAG, to review projects and plans throughout its jurisdiction. In the Southern California region, with exception of the County of San Diego, SCAG acts as the region's "Clearinghouse," and collects information on projects of varying size and scope to provide a central point to monitor regional activity.

The Project is not considered to be a regionally significant project pursuant to CEQA Guidelines 15206.[121] The consideration for a commercial development is employing more than 1,000 persons or more than 250,000 square feet. The Project would have approximately 200 hotel rooms and 6,500 square feet of restaurant and retail. As such, the Project will not be required to demonstrate consistency with SCAG policies contained in the RCPG, Sustainability Program, RCP, or RTP.

South Coast Air Quality Management District (SCAQMD)

Air Quality Management Plan (AQMP)

In the South Coast Air Basin, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2012 Air Quality Management Plan (AQMP).[122] The AQMP works with the Southern California Association of Governments (SCAG) to forecast population growth for the region and develops a long-term attainment plan to accommodate the air pollution impacts of such growth. Because population growth drives the demand for jobs and housing that contribute to regional air pollution, projects that are consistent with regional population forecasts built into the AQMP are considered to have less-than-significant impacts on regional air quality. Consistency with jobs and housing projections are also considered as secondary barometers for growth.

Because the Project will not directly increase population (Project is a hotel and commercial development), its impact on regional air quality is accommodated by the overall growth assumptions in the 2012 AQMP. Additionally, the Project is infill development that generally produces a smaller impact on regional emissions because it accommodates growth in an urban area with commercial density and transportation infrastructure that ultimately reduces vehicle travel demand and activity. The Project is consistent with the SCAQMD's 2012 AQMP and is considered to have a less-than-significant cumulative effect on regional air pollution.

Los Angeles County Metropolitan Transportation Authority (Metro)

Congestion Management Plan (CMP) for Los Angeles County.

The CMP for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects that are eligible to compete for state gas tax funds. Within Los Angeles County, Metro is the designated congestion management agency responsible for

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[121] *CEQA, Section 15206, Projects of Statewide, Regional, or Areawide Significance: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/Handout_CCR_15206_Statewide,Regional,Areawide_052007.pdf, accessed February 20, 2014.*

[122] *SCAQMD, AQMP: http://www.aqmd.gov/aqmp/aqmpintro.htm*

coordinating the CMP. See Section 16 Transportation and Traffic, question b, in this IS/MND, for a discussion of the CMP. The traffic study provided the following conclusion: No CMP intersection (Santa Monica and Highland Avenue) or freeway (Hollywood Freeway) impact is anticipated.[123]

Consistency with City and Local Plans

City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals.[124] The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Plan for Healthy LA, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Services Systems/Public Recreation Plan, Safety Element, and Mobility Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements. The General Plan Land Use Framework Element identifies the Project Site as Regional Center Commercial.[125] Regional centers are intended to serve as the focal points of regional commerce, identity, and activity. They cater to many neighborhoods and communities and serve a population of 250,000 to 500,000 residents. They contain a diversity of uses such as corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Region-serving retail commercial malls and retail services should be integrated where they complement and support the other uses in the regional center. The development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities. Regional centers, typically, provide a significant number of jobs and many non-work destinations that generate and attract a high number of vehicular trips. Consequently, each center shall function as a hub of regional bus or rail transit both day and night. Good quality street, area, and pedestrian lighting is essential to generating feelings of safety, comfort, and well being necessary for ensuring public nighttime use of transit facilities. They are typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Generally, regional centers will range from FAR 1.5:1 to 6:1 and are characterized by six- to twenty-story (or higher) buildings as determined in

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[123] *Traffic Impact Study, Overland Traffic Consultants, 2016.*

[124] *California Government Code Section 65300.*

[125] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org*

the community plan. Their densities and functions support the development of a comprehensive and inter-connected network of public transit and services. Physically, the regional centers are generally characterized by three forms of development:

1. Areas containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages (e.g., Wilshire and Hollywood Boulevards). The intensity of activity and incorporation of retail uses in the ground floor of these structures should induce considerable pedestrian activity.

2. Areas containing mid- and high-rise structures sited on large independent lots, set back from the property frontages (e.g., Warner Center and most of Century City). Though inhibited by the separation of structures, it is encouraged that buildings and sites be designed to improve pedestrian activity within the center.

3. Areas containing retail commercial "malls," characterized by low- and mid-rise buildings clustered around common pedestrian areas. It is encouraged that these buildings be sited and designed to improve their relationships to their principal street frontages, enhancing pedestrian activity.

Discussion

The Project is proposing hotel and commercial uses in a 7-story building with an FAR of approximately 3.0:1. The Site is near two Red Line subway stations, which are major transit centers. The Project is consistent with the physical characteristics of development type No. 1, identified above. The Project would be a mid-rise structure (mid-rise within the context of that area of Hollywood, which has low-rise 1 to 3-story buildings, and high rise buildings around Highland Avenue and Vine Street) along Cahuenga Boulevard (which is a secondary highway). There are additional 2-12 story buildings along Hollywood Boulevard. The intensity and incorporation of ground floor retail in the Project building would induce pedestrian activity.

Table 3.10-2, General Plan Land Use, lists the goal, objective, and policies for land use that apply to developers in collaboration with local government. As shown, the Project would not conflict with the applicable (developer-controlled or focused) policies of the General Plan for each land use. The Project's integration of hotel and commercial uses in a commercially-designated land use area is consistent with the goal and objective of the General Plan Framework for a Regional Center Commercial designation. Therefore, no significant impacts due to consistency with land use designations in the General Plan Framework are anticipated.

Plan inconsistencies in and of themselves are not a significant impact on the environment cognizable under CEQA, which recognizes only direct physical changes in the environment or reasonably foreseeable indirect physical changes in the environment.[126] Moreover, the City's threshold of

[126] *See Guidelines Section 15064(d)-(e),*

significance considers only inconsistencies with policies "adopted for the purpose of avoiding or mitigating an environmental effect." The Framework Element's goals, objectives and policies were adopted for primarily economic purposes, not to avoid or mitigate environmental impacts. To the extent the Framework's provisions arguably reflect environmental considerations, they address whether industrial uses would affect nearby land uses. The Project does not affect these policies because CEQA considers only the Project's impacts on its environment, not the environment's impacts on the Project.

Hollywood Community Plan

The Project Site is located within the Hollywood Community Plan which was adopted in December 1988 (1988 HCP).[127] Until recently, the Project Site was subject to the Hollywood Community Plan Update (HCP Update), which was adopted by City Council on June 19, 2012 (and its associated zoning ordinance as Ordinance No. 182,173). On February 11, 2014, the Superior Court ordered a preemptory writ of mandate that the City take the necessary steps to rescind, vacate, and set aside all actions approving the HCP Update, the certified EIR and any and all actions that derive from the HCP Update. The court also enjoined the City from granting any authority, permits or entitlements that derive from the HCP Update or the EIR. On April 2, the City Council adopted a resolution to rescind the HCP Update and adopted Ordinance No. 182960 to repeal the associated zoning ordinance all to comply with the court's order. Therefore, the HCP Update and the associated zoning ordinance have been repealed, rescinded and invalidated. By operation of law, the 1988 Community Plan (See City Council action CF 12-0303 S4), in conjunction with the applicable provisions of the Los Angeles Municipal Code (LAMC) guide the land use and zoning on the Project Site, respectively.

The 1988 HCP contains policies and objectives to guide development and uses planned within the City. Not every goal, policy, or objective is applicable to the Project or the Project Site. The 1988 HCP is 28 years old and provided projections through the year 2010. As such, some of its objectives and policies are out-of-date with the current existing setting, including the recent developments in the area, and the addition of the Metro Red Line subway and Metro Rapid bus routes. The 1988 HCP is intended to promote an arrangement of land use, circulation, and services that will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community within the larger framework of the City; guide the development, betterment, and change of the Community to meet existing and anticipated needs and conditions; balance growth and stability; reflect economic potentials and limits; land development and other trends; and protect investment to the extent reasonable and feasible. Table 3.10-3, 1988 Hollywood Community Plan, sets forth the 1988 HCP's seven objectives and land use (commerce) policies and discusses the Project's consistency and applicability with each of them.

The seven objectives are directed to the City (government) and other various departments and agencies within, to coordinate and encourage certain types of development, while preserving open space. None of the objectives apply to private development. The Project has sent information requests describing the

[127] *1988 Hollywood Community Plan: http://cityplanning.lacity.org/complan/pdf/HwdCpTxt.pdf*

Project to the various public service and utility providers. In addition, the Project does not affect the circulation system (objective 6). The provisions of public services and utilities are coordinated by the various agencies (LAFD, LAPD, Parks and Recreation, and Library). The Project would not conflict with any of the objectives. The 1988 HCP also contains policies and standards for circulation (directed to LADOT and Metro), recreation and parks (directed to LADRP), fire protection (directed to LAFD), public schools (directed to LAUSD), library (directed to the LAPL), and other public facilities (directed to energy provider LADWP), and social services (directed to social services providers). As such, these, policies and standards do not apply to private developments, and are not applicable to this Project. The Project would be consistent with all applicable policies related to the buildings siting, location, uses, and design features. The Hollywood Community Plan's Regional Center Commercial designation corresponds to the C4, C2, P, PB, RAS3, and RAS4 zones. The Project complies with the parameters of the zone.

Los Angeles State Enterprise Zone (ZI-2374)

The Project is within the Los Angeles State Enterprise Zone.[128] The Federal, State, and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. The Enterprise Zone (EZ) special provisions applicable to plan check relate to parking standards and height.

> Parking Standards - Section 12.21A4(x)(3):
>
> Except for the Downtown Business District parking area described in Section 12.21.A.4(i), projects within EZs may utilize a lower parking ratio for commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings thus increasing the buildable area of the parcel which is critical in older areas of the City where parcels are small.
>
> Height - Section 12.21.4:
>
> Special height districts "EZ1", "EZ1-L", "EZ1-VL", "EZ1-XL", "EZ2", "EZ3" and "EZ4 were established for Enterprise Zones. Height district "EZ1" increases the total floor area contained in all the buildings on a lot to three times the buildable area. Note that the "EZ..." height district suffix must be accomplished by a Zone Change.[129]

The Project would provide at least code-required parking (utilizing an automatic bike parking reduction, and any required bike substitutions per LAMC Section 12.21.A.4) to make up for any shortfall. The

[128] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/*

[129] *Enterprise Zone (ZI-2374): http://zimas.lacity.org/documents/zoneinfo/ZI2374.pdf*

allowable height is unlimited, and no story limit. The proposed height is 86'-6" (Top of Roof) and 74'-7 1/4" (Top of Amenities).

Revised Hollywood Community Plan Injunction (ZI-2433).

The Project is within the Revised Hollywood Community Plan Injunction area.[130] All entitlement applications filed after April 2, 2014 must be in conformance with the 1988 Hollywood Community Plan and zoning ordinances and regulations in effect prior to June 19, 2012.[131] The Project would comply with this requirement and the analysis contained herein is based on the 1988 Hollywood Community Plan.

Hollywood Redevelopment Project Area (ZI-1352)

The Project is within the Hollywood Redevelopment Project Area.[132] All applications within the Hollywood Redevelopment Project Area requesting a permit for construction, remodeling, improvements, alterations including seismic compliance, demolition and/or signs must be referred to the Community Redevelopment Agency (CRA) for both CEQA clearance and permit approval.[133]

The Project Site is located in the Redevelopment Project Area, Hollywood Core Transition District. Properties designated on the Redevelopment Plan Map as "Hollywood Core Transition District" shall be given special consideration due to the low density of the adjacent residential areas. The objective of this District is to provide for a transition in the scale and intensity of development between Regional Center Commercial uses and residential neighborhoods. The CRA shall review all building permits in this District to ensure that circulation patterns, landscaping, parking and the scale of new construction is not detrimental to the adjacent residential neighborhoods. The Project is not near or adjacent to any residential area.

On December 29, 2011, the California Supreme Court issued its decision in *California Redevelopment Association v. Matosantos*. The decision upheld recently enacted state law dissolving all California redevelopment agencies including the CRA/LA and made the dissolution of the agencies effective February 1, 2012. For purposes of this analysis, any references to the former CRA/LA are intended to mean the Designated Local Authority pursuant to changes in state law as discussed above. CRA is statutorily prohibited from entering any new agreements and is currently only allowed to wind down CRA affairs, including honoring existing obligations and addressing land use issues consistent with CRA's land

[130] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/.*

[131] *Revised Hollywood Community Plan Injunction (ZI-2433): http://zimas.lacity.org/documents/zoneinfo/ZI2433.pdf*

[132] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/.*

[133] *Hollywood Redevelopment Project Area (ZI-1352): http://zimas.lacity.org/documents/zoneinfo/ZI1352.pdf*

use powers under the Redevelopment Plan. To date, the CRA has not transferred its land use powers to the Los Angeles Department of City Planning.

The Project is undergoing the CEQA process, which provides public review and input on the analysis of the Project. The Project provides a net increase in employment opportunities onsite. The Project is a mixed-use development with hotel and commercial uses to serve the diverse needs in the Hollywood area. The hotel uses would support the entertainment industry by providing hotel rooms in Hollywood close to the entertainment business sector establishments.

ZI-2277

The Project is subject to ZI-2277.[134] This states as per Ord. # 173562, effective 10/20/2000, for a period of 365 days (with a possible 180 days extension), issue no permit for any off-site signs (billboards) in the Hollywood CRA area City of Los Angeles Planning and Zoning Code. The Project would comply with this requirement.

Los Angeles Municipal Code

Zoning Code

The Site is zoned C4-2D. The C4 zone allows uses in the C1 zone, which includes hotels.[135] The allowable height is unlimited, and no story limit. The proposed height is 86'-6" (Top of Roof) and 74'-7 1/4" (Top of Amenities). The by-right floor-area-ratio (FAR) is 3:1. The proposed FAR is approximately 3.0:1.[136] The building would be approximately 72,745 square feet in floor area.[137] The allowable density is unlimited per LAMC Section 12.22.A.18.a and 12.12.C.4. The proposed density is 175 hotel rooms.

Conclusion

The Project will not conflict with policies adopted to avoid or mitigate environmental impacts. The requested discretionary actions do not conflict with urban land uses in the area and the Project would not introduce a new incompatible use. The Project's hotel and commercial uses are compatible with the

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[134] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/.*

[135] *Generalized Summary of Zoning Regulations: http://planning.lacity.org/zone_code/Appendices/sum_of_zone.pdf*

[136] *20,207 sf lot area x 3.0 FAR = 60,621 sf.*

[137] *Note - square footage calculation – The area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building operating equipment or machinery, parking areas with associated driveways and ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and basement storage areas.*

commercial and entertainment area. The proposed building's 7-story height would be comparable with other structures in the area, and thus will not introduce an incompatible element into the community. The Project does not conflict with the Hollywood Community Plan through its zoning and permitted uses. The Project is consistent with the SCAG guides and other regional guides, the General Plan, the 1988 HCP objectives and policies, to the extent feasible and applicable, as discussed above. As such, impacts with respect to applicable land use plans, policies and zoning would be less than significant.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A significant adverse effect could occur if a Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. The Project Site is located in an urbanized and fully developed portion of the City. Due to the existing urban development on the Project Site, there are no known locally designated natural communities on the Project Site or in the vicinity. Therefore, the Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact will occur.

Table 3.10-1

SCAG Regional Comprehensive Plan

Policies	Discussion
Land Use and Housing [1]	
LU-6.2 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Programs.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, through mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Open Space and Habitat [2]	
OSN-14 Developers and local governments should implement mitigation for open space impacts through the following activities: • Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space. • Individual projects should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA's Critter Crossings, and Ventura County Mitigation Guidelines. • Project level mitigation for RTP's significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from	**Consistent.** The Project would be an urban infill development that avoids significant impacts to regionally significant open space resources. The Project is located in a developed area of Hollywood surrounded by other buildings. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Project Site. There are no street trees on the City sidewalk and no landscaping on the Site.

Policies	Discussion
the growth associated with transportation projects and improvements. • Project sponsors should fully mitigate direct and indirect impacts to open space resulting from implementation of regionally significant projects.	
OSC-9 Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.	**Not Applicable.** OSC-9 does not apply to this Project as it is not next to natural areas for outdoor recreation. The Site would not impede access to natural lands.
OSC-10 Developers and local governments should promote infill development and redevelopment to revitalize existing communities.	**Consistent.** The Project is an infill development in an existing community.
OSC-11 Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as air quality (pollution) and solid waste recycling and reduction mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
OSC-12 Developers and local governments should promote water-efficient land use and development.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as water-efficient features, through mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
OSC-13 Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	**Consistent.** The Project would contain multiple uses (hotel and commercial) and be a redevelopment of an urban area.
Water [3]	
WA-9 Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.	**Consistent.** The Project includes conservation features (regulatory compliance measures) to reduce operational water use, per LADWP and LAMC requirements.
WA-10 Developers and local governments should include conjunctive use as a water management strategy when feasible.	**Consistent.** Conjunctive use is the coordinated management of surface water and groundwater supplies to maximize the yield of the overall water resource. An active form

Policies	Discussion
	of conjunctive use utilizes artificial recharge, where surface water is intentionally percolated or injected into aquifers for later use. The Project would not conflict or preclude the City from exploring conjunctive use as a water management strategy.
WA-11 Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	**Consistent**. The Project would confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. The Project shall implement any upgrade to the water infrastructure serving the Project Site that is needed to accommodate the water consumption needs.
WA-12 Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	**Consistent.** The Project would include landscaping on the ground floor, a central courtyard, and rooftop level that is irrigated with water conservation techniques
WA-13 Developers and local governments should protect and preserve vital land resources—wetlands, groundwater recharge areas, woodlands, riparian corridors, and production lands. The federal government's 'no net loss' wetlands policy should be applied to all of these land resources.	**Not Applicable.** The Project would not impact wetlands.
WA-27 Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.	**Consistent.** The Site is currently developed with a building and parking. The Project will similarly cover the entire site with a building. The Project will not result in a change in the amount of impervious surface area at the Project Site.
WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.	**Consistent.** The Project will comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project would also be consistent with the City of Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Energy [4]	
EN-8 Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation	**Consistent.** The Project would be a mixed-use hotel and commercial development that is in proximity to local transit lines, including Metro buses. The Project would encourage biking and walking trips due to bicycle parking and within a pedestrian-oriented area

Policies	Discussion
mechanisms: • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips.	along Cahuenga Boulevard and near Sunset Boulevard.
EN-10 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include: • Using energy efficient materials in building design, construction, rehabilitation, and retrofit • Encouraging new development to exceed Title 24 energy efficiency requirements. • Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. • Utilizing efficient commercial/residential space and water heaters: this could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits. • Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, which allow communities to generate their own electricity • Orienting streets and buildings for best solar access. • Encouraging buildings to obtain at least 20% of their electric load from	**Consistent.** The Project would be in compliance with the City's Green Building Ordinance, which contains energy efficient practices.

Policies	Discussion
renewable energy.	
EN-11 Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction should be completed according to the specifications of the energy provider.	**Consistent.** The LADWP does not provide consumption rates so the SCAQMD rates are used to calculate estimated electrical usage for the Utilities section of this IS/MND. Electrical service is available and will be provided in accordance with the LADWP's Rules Governing Water and Electric Service. Southern California Gas Company (SCG) would serve the Project's natural gas needs. In the event that SCG cannot provide service from the existing infrastructure, SCG will conduct system analysis and determine the best method to provide gas to the customer, when the total requested load for the Project is received.
EN-12 Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to o□set new demand on conventional power sources.	**Consistent.** This is an encouragement to incorporate solar panels, not a requirement. Solar panels would not be precluded from being able to be placed on the roof of the hotel.
EN-14 Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.	**Consistent.** The Project retail component would comply with the LAMC requirements for all mandatory (Code-required) transportation measures to reduce single-occupancy vehicle trips.
Solid Waste [5]	
SW-14 Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include: • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish	**Consistent.** The Project would include a demolition and construction waste recycling program as well as an operational recycling program as required by LAMC. The Project will recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. During operation, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.

Policies	Discussion
material (e.g. stained concrete flooring, unfinished ceilings, etc.). • Reuse of existing building structure and shell in renovation projects. • Building lifetime waste reduction measures that should be explored for new and remodeled buildings include: • Development of indoor recycling program and space. • Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components.	
SW-17 Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.	**Not Applicable.** The Project would not be a composting, or composting, recycling, or conversion technology facility.
SW-18 Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.	**Not Applicable.** The Project would not be a waste management facility.
SW-19 Developers and local governments should facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.	**Not Applicable.** The Project would not be an eco-industrial park.
SW-20 Developers and local governments should prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities near existing waste management or material recovery facilities.	**Not Applicable.** The Project would not be a solid waste management facility.
SCAG Regional Comprehensive Plan: http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf *[1] Page 21; [2] Pages 34 and 39; [3] Pages 59-61; [4] Pages 75-76; [5] Pages 105-106* *Table: CAJA Environmental Services, August 2015.*	

Table 3.10-2
General Plan Land Use (Framework Element)

Goal, Objective, Policies	Discussion
Regional Centers	
GOAL 3F Mixed-use centers that provide jobs, entertainment, culture, and serve the region.	**Consistent.** The Project would create a mix of uses (hotel and retail) that provides jobs, entertainment (restaurant and bar), and serves the region.
Objective 3.10 Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	**Consistent.** The Project would create a mix of uses (hotel and retail) that provides jobs, and is served by the Metro Red Line at two nearby stations, which provides access to the greater region. The uses are compatible with other existing uses in the area. The Project will also enhance urban lifestyles by developing a size and scale more appropriate for an urban regional center compared to the Project Site's existing underutilized condition.
Policy 3.10.1 Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6. Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and densities/intensities of uses permitted in any area shall be identified in the community plans	**Consistent.** The Project would create a hotel and retail development that serves the region and is accessible due to the Metro Red Line at two nearby stations. The commercial uses support the hotel uses and also would be available to the public. Table 3-1 (as part of the General Plan Land Use policy 3,10.1) states that Regional Commercial typically includes eating and drinking establishments, retail/commercial, and commercial overnight accommodations, among other uses. Regional centers generally have an FAR of 1.5:1 to 6:1. The Project's FAR would satisfy this requirement. Table 3-6 (of the General Plan) states that Regional Commercial Land Use designation corresponds to CR, C1.5, C4, and [Q]C2 zones. The Project Site's C4 zone satisfies this requirement.
Policy 3.10.2 Accommodate and encourage the development of multi-modal transportation centers, where appropriate.	**Not Applicable.** A multi-modal transportation center is typically a location served by a variety of transportation agencies, types, services, and frequencies. The Project Site is an infill development in Hollywood that is not appropriate for a transportation center. The area is well served by Metro buses and Metro Red Line.
Policy 3.10.3 Promote the development of high-activity areas in appropriate locations	**Consistent.** The Project is located in Hollywood and along Cahuenga Boulevard near

Goal, Objective, Policies	Discussion
that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies 3.16.1 through 3.16.3, and provide adequate transitions with adjacent residential uses at the edges of the centers. *Policy 3.16.1* Enhance pedestrian activity in areas designated as a Pedestrian-Oriented District ("-PD") by the design and siting of buildings in accordance with the policies contained in Chapter 5: Urban Form and Neighborhood Design. *Policy 3.16.2* Locate parking in pedestrian districts to the rear, above, or below the street-fronting uses. *Policy 3.16.3* Require that the ground floor of parking structures located along primary street frontages in pedestrian-oriented districts be designed to promote pedestrian activity and, where appropriate, incorporate retail uses.	Sunset, which is a high pedestrian activity area. The Project includes ground-floor commercial uses and a design that enhances the pedestrian experience with glass storefronts and material and design changes on the upper levels to scale to pedestrians. Policy 3.16.1 is not applicable because the area is not designated –PD. The Project would comply with the standards of the Urban Design Chapter of the Community Plan. Policy 3.16.2 is applicable and parking would be provided on-site in a subterranean level. Policy 3.16.3 is not applicable because the Project does not include ground floor parking. Parking would be in subterranean levels.
Policy 3.10.4 Provide for the development of public streetscape improvements, where appropriate.	**Consistent.** The Project would implement a number of streetscape improvements, including the planting and maintenance of jacarandas, palms, and collaborative paving, as depicted on the Project plans.
Policy 3.10.5 Support the development of small parks incorporating pedestrian-oriented plazas, benches, other streetscape amenities and, where appropriate, landscaped play areas.	**Consistent.** The Project does not include residential uses or permanent residents, which typically use and benefit from parks. The Site is constrained on all sides by streets and an alley. The limit of the size of the Site precludes plazas. However, the Project would not impede parks, plazas, streetscape amenities on public right-of-ways, and in fact, the Project proposes a number of streetscape amenities as depicted on the Project plans.
Policy 3.10.6 Require that Regional Centers be lighted to standards appropriate for nighttime access and use.	**Consistent.** The Project lighting would be standard for hotels and commercial uses. Regulatory compliance measures would ensure that outdoor lighting shall be designed and installed with shielding if necessary, such that the light sources cannot be seen from adjacent residential properties.

General Plan, Chapter 3-Land Use, Regional Centers: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm
Table: CAJA Environmental Services, August 2015.

Table 3.10-3
1988 Hollywood Community Plan

Objective and Policies	Discussion
Objectives of the Plan	
Objective 1 To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area. To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.	**Consistent**. Similar to all discretionary development projects in Hollywood, the Project is coordinated through the same City Planning Department review and approval process that applies City-wide. This procedure applies consistent standards and compliance measures for development. Furthermore, the Project provides employment, and retail services in the Hollywood area and furthers the development of Hollywood as a major center of population, employment retail services and entertainment.
Objective 2 To designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities projected to the year 2010.	**Consistent**. The Project provides hotel and commercial uses that would accommodate the surrounding area beyond the projected year of 2010. Additionally, the Project's proposed FAR is consistent with the area's urban character and appropriate to accommodate activities beyond the projected year of 2010.
Objective 3 To make provisions for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice. To encourage the preservation and enhancement of the varied and distinctive residential character of the community, and to protect lower density housing from the scattered intrusion of apartments. In hillside residential areas to: a. Minimize grading so as to retain the natural terrain and ecological balance. b. Provide a standard of land use intensity and population density which will be compatible with street capacity, public service facilities and utilities, and	**Not Applicable**. Even though the Project Site's C4 zone could include housing, the Project does not include housing.

Objective and Policies	Discussion
topography and in coordination with development in the remainder of the City.	
Objective 4 To promote economic well being and public convenience through: a. Allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards. b. Designating lands for industrial development that can be so used without detriment to adjacent uses of other types, and imposing restrictions on the types and intensities of industrial uses as are necessary for this purpose. c. Encouraging the revitalization of the motion picture industry. d. Recognizing the existing concentration of medical facilities in East Hollywood as a center serving the medical needs of Los Angeles.	**Consistent**. The Project provides hotel and retail uses. The proposed FAR is consistent with smart growth principles. It provides ground-floor retail near a transit corridor (Sunset Boulevard) and appropriately locates density near transit, thereby assisting with efforts to reduce vehicle miles traveled and to increase pedestrian walkability and other modes of transit. The Project does not include industrial uses and would not conflict with the motion picture industry (existing uses are not related to the industry). The Project would not affect the concentration of medical facilities in East Hollywood.
Objective 5 To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.	**Consistent**. The Project would coordinate the development with public facilities such as the Los Angeles Department of Water and Power for electricity and water services, the Bureau of Sanitation for wastewater service, and the LAFD and LAPD for fire and police protection, as part of the plan check and building permit process.
Objective 6 To make provisions for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage expansion and improvement of public transportation service.	**Consistent**. The IS/MND includes a traffic analysis that analyzes the potential impacts to the area's circulation system. This analysis is based on the Traffic Study, which was reviewed and approved by the Los Angeles Department of Transportation.
Objective 7 To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.	**Not Applicable**. The Project is an infill development surrounded by existing developments. There is no public open space on the Project Site. The Project Site does not provide views, natural character and topography of the mountainous parts of the area.

Objective and Policies	Discussion
Land Use – Commerce – Standards and Criteria	
The commercial lands (including associated parking) designated by this Plan to serve residential areas are adequate to meet the needs of the projected population to the year 2010, as computed by the following standards: ***1.*** 0.6 acres per 1,000 residents for commercial uses for neighborhood or convenience-type commercial areas; ***2.*** 0.2 acres per 1,000 residents for commercial uses for community shopping and business districts, including service uses and specialized commercial uses.	**Consistent**. The Project would not change the existing Regional Commercial land use designation of the site. Further, the Site is a commercial area approximately 0.464 acres and it would have ground floor commercial retail uses available to serve residents in the area.
Parking areas should be located between commercial and residential uses on the commercially-zoned properties where appropriate to provide a buffer, and shall be separated from residential uses by means of at least a solid masonry wall and landscaped setbacks.	**Consistent**. Parking would be contained within the building in subterranean parking levels.
Source: 1988 Hollywood Community Plan, pages HO-1 to HO-3: http://cityplanning.lacity.org/complan/pdf/HwdCpTxt.pdf *Table: CAJA Environmental Services, August 2015.*	

11. MINERAL RESOURCES

a) Would the project 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. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 sites in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.[138]

MRZ-2 sites are identified in two community plan elements of the city's general plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.[139] Neither the Project Site nor the surrounding area is identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Project Site is not located within any Major Oil Drilling Areas, which are 25 City designated major oil drilling areas. The nearest one is #16 Salt Lake Oil Field, a broad swath of land generally south of Melrose Avenue, north of Wilshire, east of Beverly Hills, and west of Vine Street.[140] The California Department of Conservation has online mapping of wells. No oil wells exist on the Project Site.[141] The nearest well (API 03720765, Chevron USA) is located southeast of the Project Site, on Afton Place, near El Centro Avenue. Therefore, no impacts will occur.

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[138] *City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58: http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf, August 27, 2015.*

[139] *City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-59: http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf, August 27, 2015.*

[140] *City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, August 27, 2015.*

[141] *State of California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1, website: http://maps.conservation.ca.gov/doggr/#, August 27, 2015.*

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or potential future locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction. The Project Site is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 11(a), no oil wells exist on the Project Site. Furthermore, the Project Site is surrounded by dense urban uses and residential uses. Thus, the Project Site would not be an adequate candidate for mineral extraction. Therefore, no impacts to loss of availability of a locally important mineral resource will occur.

12. NOISE

The section is based in part on the following item, included as Appendix B of this IS/MND:

B Air Quality, Greenhouse Gases, and Noise Appendices, DKA Planning, November 2015.

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant with Mitigation Incorporated. Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA.

Noise Definitions

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level (L_{eq}).

- Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 PM and 10:00 PM is as if the sound were actually 5 dBA higher than if it occurred from 7:00 AM to 7:00 PM when background ambient noise levels are higher. From 10:00 PM to 7:00 AM, humans perceive sound as if it were 10 dBA higher due to an even lower background noise level. Accordingly, the CNEL is obtained by adding an additional 5 dBA to measured or projected sound levels in the evening from 7:00 PM to 10:00 PM and 10 dBA to sound levels in the night from 10:00 PM to 7:00 AM. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour measured or projected average.

- Equivalent Noise Level. L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Effects of Noise

The degree to which noise can impact the environment ranges from levels that interfere with speech and sleep to levels that cause adverse health effects. Human response to noise is subjective and can vary from person to person. Factors that influence individual response include the intensity, frequency, and pattern

of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes

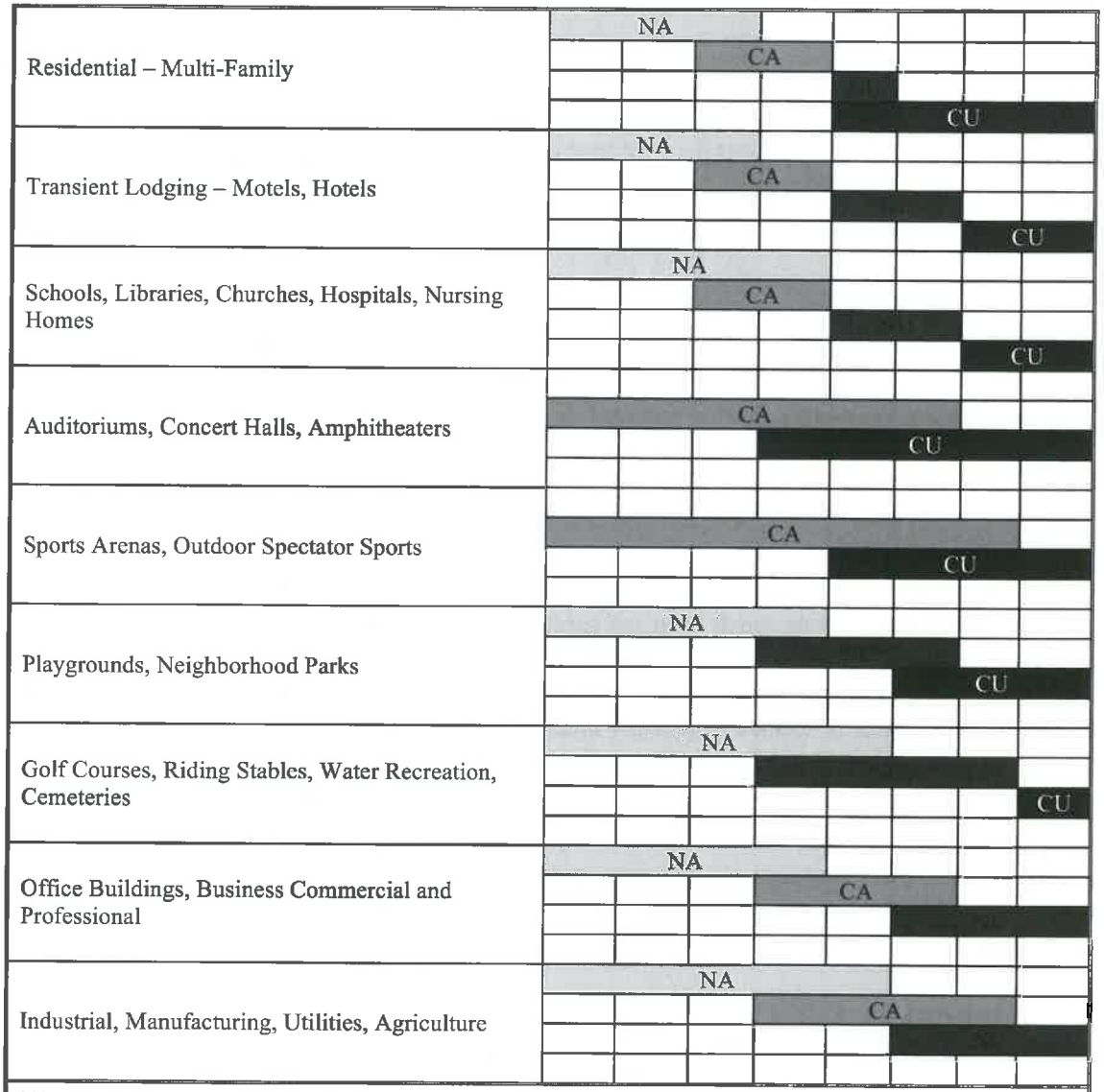
Small perceptible changes in sound levels for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and could produce a community reaction. A 10 dBA increase is heard as a doubling in loudness and would produce a community response. Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of distance. For example, if a noise source produces a noise level over a hard surface of 89 dBA at a reference distance of 50 feet, the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line-of-sight, a visual path between the noise source and noise receptor. Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver can greatly reduce noise levels from the source since sound can only reach the receiver by diffraction. Sound barriers can reduce sound levels by up to 20 dBA or more. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced. The California Department of Health Services has established guidelines for acceptable exterior noise levels for each county and city. These standards are incorporated into the land use planning process to reduce future noise and land use incompatibilities. Table 3.12-1 reflects State guidance that allows the City to ensure integrated planning for compatibility between land uses and outdoor noise.

State interior noise standards were established in 1974, when the California Commission on Housing and Community Development adopted noise insulation standards for residential buildings (Title 24, Part 2, California Code of Regulations). Title 24 establishes standards for interior room noise attributable to outside noise sources. Title 24 also specifies that acoustical studies should be prepared whenever a residential building or structure is proposed to be located in areas with exterior noise levels of 60 dB Day-Night Average Noise Level (L_{dn}) or greater. The acoustical analysis must show that the building has been designed to limit intruding noise to an interior level not exceeding 45 dB L_{dn} for any habitable room.

Table 3.12-1
Land Use Compatibility for Community Noise Environments

Land Use Compatibility	Community Noise Exposure (dBA, CNEL)							
	<	55	60	65	70	75	80	>
Residential – Low Density Single-Family, Duplex Mobile Homes	NA							
		CA						
					NC			
					CU			



NA = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

CA = Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.

NU = Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

CU = Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Noise Control, Department of Health Services.

Applicable Regulations

The City of Los Angeles Municipal Code (LAMC) has established both construction and operation noise regulations. Between the hours of 7:00 AM and 10:00 PM, in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet from the equipment itself:

- 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

- 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

- 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.[142]

There is no residential zone or residential use within 500 feet of the Project Site. These noise limits do not apply where compliance is deemed technically infeasible. Specifically, such activities are allowed when it is demonstrated that compliance is not possible "despite the use of mufflers, shields, sound barriers, and/or other noise reduction device or techniques during the operation of the equipment."[143] Section 41.40 of the LAMC also prohibits construction activity from occurring between 9:00 p.m. and 7:00 a.m. Monday through Friday, and between 6:00 p.m. and 8:00 a.m. on Saturday.[144] This is intended to protect persons occupying sleeping quarters in any hotel, apartment, or other place of residence. Construction noise intruding onto property zoned for manufacturing or industrial uses is exempt from these standards.

The City released the L.A. CEQA Thresholds Guide in 2006 and provided further guidance on determining the significance of noise impacts. As such, a project would normally have a significant impact on noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;

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[142] *City of Los Angeles, Municipal Code, Section 112.05.*

[143] *Ibid.*

[144] *City of Los Angeles, Municipal Code Chapter IV-Public Welfare (Section 41.40), 1984.*

- Construction activities lasting more than ten days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or

- Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.[145]

In addition, a project would normally have a significant impact on noise levels from project operations if:

- The project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase.[146]

Operation Noise Standards

LAMC Chapter XI, "Noise Regulation," regulates noise from non-transportation noise sources such as commercial or industrial operations, mechanical equipment or residential activities. Although these regulations do not apply to vehicles operating on public rights-of-way, the regulations do apply to noise generated by vehicles on private property, such as truck operations at commercial or industrial facilities. The exact noise standards vary depending on the type of noise source, but the allowable noise levels are generally determined relative to the existing ambient noise levels at the affected location. Ambient noise is defined as "the composite of noise from all sources near and far in a given environment, exclusive of occasional and transient intrusive noise sources and of the particular noise source or sources to be measured.[147] Ambient noise shall be averaged over a period of at least 15 minutes..." Table 3.12-2 summarizes minimum ambient noise levels for various land uses. In the event ambient levels at a subject location are lower than that provided in the table, the level in the table is assumed.

Table 3.12-2
City Of Los Angeles Minimum Ambient Noise Levels

Zone	Allowable Average Noise Level (L_{eq})	
	Daytime (7 a.m. – 10 p.m.)	Nighttime (10 p.m. – 7 a.m.)
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50 dB(A)	40 dB(A)
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60 dB(A)	55 dB(A)
M1, MR1, and MR2	60 dB(A)	55 dB(A)

[145] *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.1-3.*

[146] *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.2-3.*

[147] *City of Los Angeles, Municipal Code Chapter XI. Section 111.01.*

M2 and M3	65 dB(A)	65 dB(A)
Source: City of Los Angeles Municipal Code, Section 111.03, 1982		

At the boundary line between two zones, the allowable noise level of the quieter zone shall be used.[148] The allowable noise levels are then adjusted if certain conditions apply to the alleged offensive noise, as follows:

- For steady tone noise with an audible fundamental frequency or overtones (except for noise emanating from any electrical transformer or gas metering and pressure control equipment existing and installed prior to September 8, 1986) – reduce allowable noise level by 5 dBA.
- For repeated impulsive noise – reduce allowable noise level by 5 dBA.
- For noise occurring less than 15 minutes in any period of 60 consecutive minutes between the hours of 7:00 a.m. and 10:00 p.m. – increase allowable noise level by 5 dBA.

Additionally, the LAMC states that a noise level increase of five decibels over the existing average ambient noise level at an adjacent property line is considered a noise violation.[149] This standard applies to sources such as consumer electronics, HVAC systems, powered equipment intended for repeated use in residential areas and motor vehicles driven onsite. The LAMC also prohibits use of air conditioning, refrigeration, heating, pumping, or filtering equipment that increases ambient noise levels by 5 dBA.[150] It also limits noise increases from motor driven vehicles on private property to no more than 5 dBA at adjacent residential properties.[151] Finally, the City prohibits loading or unloading of vehicles, or use of dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building between 10:00 p.m. and 7:00 a.m.[152]

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[148] *The City's noise ordinance does not define the length of time over which an average noise level should be assessed. However, based on the noted reference to "60 consecutive minutes," it is concluded that the one-hour L_{eq} metric should be used. Regarding the location at which the noise measurements should be taken, the LAMC states that "except when impractical, the microphone shall be located four to five feet above the ground and ten feet or more from the nearest reflective surface. However, in those cases where another elevation is deemed appropriated, the latter shall be utilized."*

[149] *City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.04), 1986.*

[150] *City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.02), 1982.*

[151] *Ibid.*

[152] *City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.03), 1982*

The L.A. CEQA Thresholds Guide states that a project would normally have a significant impact on noise levels from operations if the project increases ambient noise at the property line of affected uses by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dBA or greater noise increase.

Construction Noise Impacts

During demolition, construction, ground clearing, grading, structural, and other 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. Table 3.12-3 summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project site include multi-family residential buildings and studios. There are a number of nearby sensitive receptors to the Project site, including:

- BuzzFeed Motion Pictures Studios; approximately 170 feet southeast of the Site
- Multi-family residences at De Longpre and Wilcox; approximately 530 feet west of the Site.
- Uses[153] at Cahuenga and Homewood; approximately 245 feet south of the Site.
- CNN Building; approximately 330 feet north of the Site.

To ascertain current ambient noise levels at nearby receptors, DKA Planning took short-term, 15-minute noise readings on November 11, 2015, using a Quest Technologies SoundPro DL Sound Level Meter.[154] Noise measurements were taken at these four locations near the proposed Project site. Predominant noise was caused by motor vehicles traveling on adjacent roadways, including Cahuenga Blvd. and De Longpre Ave. As shown in Table 3.12-3, ambient noise levels ranged from 64.8 dBA L_{eq} at BuzzFeed Motion Pictures Studios to 72.6 dBA L_{eq} at the CNN Building.

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[153] *Uses appeared to be multi-family residential during site visit. A noise measurement was taken from this location. However, ZIMAS assessor information for 1345 Cahuenga shows the parcel as Office Building, which is not a sensitive noise receptor.*

[154] *The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrothnical Commission (IEC) for general environmental noise measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground. Weather conditions were clear with negligible wind.*

Table 3.12-3
Construction Noise Levels - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
BuzzFeed Motion Pictures Studio	170	71.6	64.8	72.4	7.6
Cahuenga and Homewood	245	68.4	68.5	71.5	3.0
De Longpre and Wilcox Residences	530	61.7	71.3	71.8	0.5
CNN Building	330	65.8	72.6	73.4	0.8

Source: DKA Planning, 2015.

Construction would generate noise from on-and off-site activities that would vary over 20 months of proposed site work. Operations would include on-site equipment such as excavators, bulldozers, loaders, and smaller equipment such as saws, hammers, and pneumatic tools associated with the Project's construction. There would be secondary noise from construction worker vehicles and vendor deliveries. Given the ambient conditions in the neighborhood and the proximity of the nearby receptors, significant noise impacts could occur one monitored location during construction of the Project.

- Noise levels of up to 72.4 dBA are projected at BuzzFeed Motion Picture Studios, an increase of 7.6 dBA. These elevated noise levels would exceed the LAMC 5 dB noise threshold.

This on-site construction-related noise impacts would be considered significant but mitigable. **Mitigation Measures 12-1** through **12-6** are recommended to reduce the incremental increase in noise levels below the LAMC's 5 dB noise threshold. With regard to off-site construction-related noise impacts, up to 14 haul truck trips per day are expected to remove cut materials from the Project site during demolition, site preparation, and grading construction phases. Along with the demolition debris from the existing land use at the Project Site, this cut material could be transported to nearby landfills by ten-wheeled heavy-duty trucks. While such vehicle activity would marginally increase ambient noise levels along local roadways, this is not expected to significantly increase ambient noise levels by 5 dBA at sensitive receptors because this level of haul activity would average, at most, 2-3 haul trips per hour onto local streets, which would not produce sustained increases in noise levels over an hour or any other monitoring period. As noted in the City's "L.A. CEQA Thresholds Guide," a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming travel speed and fleet mix remain constant. While this impact is considered less than significant, **Mitigation Measure 12-7** is recommended to minimize impacts from haul trucks on local roadways.

The Project would comply with the following requirements of the City:

Regulatory Compliance Measures

Demolition, Grading, and Construction Activities

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

- The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, 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.

Mitigation Measures

Construction Phase

12-1 Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Construction and demolition shall be restricted to the hours of 7:00 am to 6:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

12-2 Two weeks prior to commencement of construction, notification shall be provided to any 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.

12-3 Temporary sound barriers, capable of achieving a sound attenuation of at least 12 dBA (e.g., construction sound wall with sound blankets) at 50 feet of distance, and capable of blocking the line-of-sight to the Buzzfeed Studios shall be installed as feasible.

12-4 All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices (utilizing all technologically feasible sound attenuation features) capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance.

12-5 All construction areas for staging and warming-up equipment shall be located as far as possible from adjacent residences.

12-6 Portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators shall be provided where feasible.

12-7 A haul route for exporting cut materials from the site to a nearby landfill should minimize travel on residential streets with sensitive receptors.

Impacts After Mitigation

As shown in Table 3.12-4, implementation of **Mitigation Measures 12-1 through 12-6** would minimize all ambient noise increases at the nearby sensitive receptors to below the 5 dBA threshold of significance.

With regard to off-site construction-related noise impacts, haul trucks and vehicle activity associated with construction workers, vendor trips, and other on-road vehicles could generate noise. This addition of any truck trips would marginally increase ambient noise along haul route roadways, as truck deployment onto local streets would not happen simultaneously, but rather be phased over the course of site preparation, grading, and construction phases. Nevertheless, implementation of **Mitigation Measure 12-7** would minimize impacts on local receptors from haul trucks.

Table 3.12-4
Construction Noise Levels - Mitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
BuzzFeed Motion Pictures Studios	170	53.6	64.8	65.1	0.3
Cahuenga and Homewood Residences	245	50.4	68.5	68.6	0.1
De Longpre and Wilcox Residences	530	43.7	71.3	71.3	0.0
CNN Building	330	47.8	72.6	72.6	0.0

Source: DKA Planning, 2015.

Operational Phase Noise Impacts

During Project operations, the development would produce both direct noise impacts on the site from hotel- 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:

Mechanical Equipment - Stationary noises from sources associated with building operations, such as heating, ventilation, and air conditioning (HVAC) systems. Section 41.40 and Chapter XI, Articles 1

through 6, of the LAMC requires that noise generated by mechanical equipment not exceed 5 dBA above ambient noise levels at adjacent property lines. Large ground level heating, ventilation, and air conditioning (HVAC) systems typically generate noise levels between 50 and 65 dBA at 50 feet.[155] Roof-top mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. This increase is considered inaudible and less than the 5 dBA significance threshold for long-term ambient noise increases.

Landscape Maintenance - Noise generated by gas lawnmowers and leaf blowers generates about 70 dBA at 5 feet of distance from the source. For each doubling of distance from a point noise source, the sound levels will decrease by 6 dBA or more. These temporary activities will cause short-term increases in noise that would not result in sustained increases in ambient noise levels of 5 dBA or more.

Hotel Land Uses - There are a variety of recurrent (e.g., consumer electronics, intercom announcements) and non-recurrent activities (e.g., social gatherings) that would elevate ambient noise levels to differing degrees. The City's noise ordinance provides a means to address nuisance that are created because of such occasional, acute noise events.

Restaurant/Retail Land Uses - Noise from recurrent activities (e.g., conversation, amplified music) or non-recurrent activities (e.g., parties) would elevate ambient noise levels to differing degrees. The City's noise ordinance would also provide a means to address nuisances related to restaurant or retail noise.

Auto-Related Activities - Trips to and from the Project would introduce recurrent, intermittent noise events, such as door slamming and vehicle engine start-ups. These activities generally produce 60-70 dBA at 50 feet of distance. However, these noise events are infrequent and do not significantly increase ambient noise. Noises from any parking garages would be negligible, as parking would be located in a subterranean garage. This should produce a net reduction in parking-related noise, as the current site includes surface level parking that produces occasional audible noise at the Project Site from vehicles entering and exiting the premises along with parking lot related noises (e.g., closing of car doors). Therefore impacts would be less than significant.

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 considered less than significant.

The majority of operational noise impacts would be from indirect noise impacts associated with the 1,748 net new vehicle trips each weekday.[156] Based on the project's traffic analysis, this could add up to 31

[155] *Los Angeles Department of City Planning, San Pedro Community Plan Draft EIR, August 2012.*

[156] *Overland Traffic Consultants, Inc., Traffic Impact Analysis for Tommie Hotel; November 2015.*

additional vehicle trips at any of the roadway segments (i.e., eastbound De Longpre Avenue to Cahuenga Boulevard) against a baseline of 170 vehicles in the peak afternoon hour. Based on guidance from the Los Angeles CEQA Guidelines, a doubling of vehicle traffic would be needed to increase ambient noise levels from roadway traffic 3 dBA. As such, the Project would increase traffic volumes 18.2 percent, an average of 0.5 additional trips every minute. This incremental increase in traffic at the most impacted roadway segment will produce inaudible increases in ambient noise and, no significant traffic impacts are projected to occur from additional Project traffic in the Project's vicinity under an existing year (2015) plus project scenario. As such, traffic-related noise increases would be inaudible, far below the 5 dBA increase considered noticeable by the public at large. Potential noise impacts from off-site vehicular sources would therefore be considered less than significant. Operational noise impacts would be less than significant, and no mitigation measures are required.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Common vibration sources include trains, buses, and construction activities.

Vibration Definitions

To quantify vibration levels, the peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal, and it is usually measures in inches per second. The PPV can be used to describe vibration impacts to buildings and humans.[157]

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually well below the threshold of

[157] *California Department of Transportation. Transportation and Construction Vibration Guidance Manual, September 2013.*

perception for humans, which is around 0.01 inches per second.[158] Most perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration are construction equipment, trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is typically not perceptible.

Applicable Regulations

To counter the effects of ground-borne vibration, the California Department of Transportation (Caltrans) has published guidance relative to vibration impacts. According to Caltrans, modern industrial/commercial buildings can be exposed to continuous ground-borne vibration levels of 0.5 inches per second without experiencing structural damage.[159] Caltrans has also established guidelines that provide thresholds for ground-borne vibration causing human annoyance. For residential land uses experiencing occasional events of ground-borne vibration or noise from transient sources, Caltrans has established a "Distinctly perceptible" threshold of 0.25 inches per second. For continuous sources, this threshold is 0.04 inches per second.[160] Some commercial buildings, such as auditoriums and theaters have additional vibration and noise annoyance criteria.

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles does not have a significance threshold to assess vibration impacts during construction, Caltrans' adopted vibration standards for buildings are used to evaluate potential impacts related to Project construction. Based on these standards, impacts relative to groundborne vibration would be considered significant if the following were to occur:

- If Continuous Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any off-site modern industrial/commercial building, or if transient activities would cause a PPV groundborne vibration level to exceed 2.0 inches per second at any similar off-site structure;

- Continuous Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any off-site newer residential structure, or transient activities would cause a PPV groundborne vibration level to exceed 1.0 inches per second at any similar off-site structure;

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158 *Ibid.*

159 *Ibid.*

160 *Ibid.*

- Continuous Project construction activities would cause a PPV groundborne vibration level to exceed 0.3 inches per second at any off-site older residential structure, or transient activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any similar off-site structure;

- Continuous Project construction activities would cause a PPV groundborne vibration level to exceed 0.25 inches per second at any off-site historic or old building, or transient activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any similar off-site structure;

- Continuous Project construction activities would cause a PPV groundborne vibration level to exceed 0.1 inches per second at any off-site fragile building, or transient activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any similar off-site structure;

- Continuous Project construction activities would cause a PPV groundborne vibration level to exceed 0.08 inches per second at any off-site extreme fragile, historic building, ruin, or ancient monument, or transient activities would cause a PPV groundborne vibration level to exceed 0.12 inches per second at any similar off-site structure.[161]

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses Caltrans' vibration impact thresholds for human annoyance potential. For transient vibration sources, Caltrans recommends 0.25 inches per second "Distinctly perceptible" threshold and 0.9 inches per second "Strongly perceptible" threshold. For continuous vibration sources, 0.04 inches per second "Distinctly perceptible" threshold and 0.10 inches per second "Strongly perceptible" threshold are recommended.[162] Table 3.12-5, Vibration Source Levels for Construction Equipment, identifies PPV levels for the types of off-road and on-road equipment that could operate at the Project site during construction.

Table 3.12-5
Vibration Source Levels for Construction Equipment

Equipment	Approximate ppv (in/sec)				
	25 ft	50 ft	60 ft	75 ft	100 ft
Large bulldozer	0.089	0.031	0.024	0.017	0.011
Caisson drilling	0.089	0.031	0.024	0.017	0.011
Loaded trucks	0.076	0.027	0.020	0.015	0.010
Jackhammer	0.035	0.012	0.009	0.007	0.004
Small bulldozer	0.003	0.001	0.0008	0.0006	0.0004

Source: California Department of Transportation, 2013.

[161] *Ibid.*

[162] *Ibid.*

Construction Vibration Impacts

As shown in Table 3.12-5, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, depending on the type of construction equipment in use.

Groundborne vibration would be generated by a number of construction activities. Vibration velocities projected to occur at the nearest off-site sensitive receptor could produce up to a 0.013 inches per second PPV at BuzzFeed Motion Pictures Studios as a result of large bulldozer operations. This is below the 0.5 inches per second PPV threshold that is considered potentially harmful to modern industrial/commercial buildings. Other potential types of construction equipment would produce less vibration and have lesser potential impacts on neighboring sensitive receptors. As shown in Table 3.12-6, the peak particle velocity and vibration levels that would occur at BuzzFeed Motion Pictures Studios during construction would be less than the thresholds associated with building damage. More distant receptors would experience even less construction-related vibration. As a result, construction-related structural vibration impacts would be considered less than significant.

Table 3.12-6
Vibration Velocities at Off-Site Sensitive Uses from Project Construction

Sensitive Uses Off-Site	Distance to Project Site (ft)	Estimated PPV (in/sec)	Structural Significance Threshold (in/sec)	Annoyance Significance Threshold (in/sec)	Significant?
BuzzFeed Motion Pictures Studios	170	0.013	0.5	0.04	No

The vibration velocities at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report: $PPV_{equip}=PPV_{ref} \times (25/D)^{1.5}$, *where* PPV_{equip} *= peak particle velocity in in/sec of equipment,* PPV_{ref} *= reference vibration level in in/sec at 25 feet, D = distance from the equipment to the receive.*
Source: DKA Planning 2015.

In terms of human annoyance, the maximum vibration level experienced at off-site sensitive receptors would also be 0.013 inches per second at BuzzFeed Motion Pictures Studios, as shown in Table 3.12-6. Pursuant to Caltrans guidance the vibration impacts from construction of the Project would not exceed the 0.04 inches per second continuous source threshold at this receptor. Additionally, more distant receptors would experience even less construction-related vibration. As a result, construction-related vibration impacts on human annoyance would be considered less than significant.

The Project could generate vibration from some hauling of demolition-related materials from the Project site. This could increase vibration along haul route roadways, though any annoyance to residents along local haul routes would be temporary. With the implementation of **Mitigation Measure 12-7**, off-site vibration impacts from haul trucks would be reduced and would be considered less than significant. The use of construction equipment would neither cause short-term building damage nor annoyance to existing

and future residences near the Project site. Off-site vibration impacts from haul trucks are expected to be less than significant.

Operation Vibration Impacts

During operation of the Project, there would not be 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. Road vehicles rarely create enough groundborne vibration to be perceptible to humans unless the road surface is poorly maintained and there are potholes or bumps. If traffic, typically heavy trucks, induces perceptible vibration in buildings, such as window rattling or shaking of small loose items, then it is most likely an effect of low-frequency airborne noise or ground characteristics. Project-related traffic would expose nearby residential land uses and other sensitive receptors during long-term operations to a vibration level far less than 0.04 inches per second and would be considered less than significant.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The majority of any long-term noise impacts will come from traffic traveling to and from the Project site. The addition of future traffic from any new development in the area and overall ambient growth in traffic would elevate ambient noise levels; nevertheless, the Project's incremental contribution to permanent off-site ambient noise levels along local roads would be negligible. As illustrated in Table 3.12-7, off-site noise generated by traffic from the Project would be negligible in the AM and PM peak hours, respectively, based on projected traffic volumes in 2018. In both periods, two roadway segments would experience a maximum increase of 0.4 dBA L_{eq}, an inaudible increase in traffic-related noise. Therefore, the Project's individual and cumulative mobile source noise impacts would be considered less-than-significant.

Further, the on-site operations would produce negligible increases in ambient noise levels at nearby sensitive receptors, as noted earlier. As a result, any on-site operational noise impacts would be considered less-than-significant. Long-term noises from cars traveling to and from the Project would also be negligible at nearby receptors, given their distance from entrances to the subterranean site garage. Any increases in ambient noise from on-site parking would be negligible.

Table 3.12-7
Estimated Cumulative Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, L_{eq} 1hr			
		No Project (2018)	With Project (2018)	Project Change	Significant Impact?
EB De Longpre between	AM	62.7	63.0	0.3	No

Table 3.12-7
Estimated Cumulative Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, L_{eq} 1hr			
		No Project (2018)	With Project (2018)	Project Change	Significant Impact?
Cahuenga and Vine	PM	65.6	65.9	0.3	No
WB De Longpre between Cahuenga and Vine	AM	63.4	63.8	0.4	No
	PM	65.4	65.8	0.4	No
NB Cahuenga between Fountain and Lexington	AM	68.6	68.7	0.1	No
	PM	68.7	68.8	0.1	No
SB Cahuenga between Fountain and Lexington	AM	69.0	69.1	0.1	No
	PM	68.5	68.6	0.1	No
NB Vine between Sunset and De Longpre	AM	71.5	71.5	0.0	No
	PM	72.4	72.4	0.0	No
SB Vine between Sunset and De Longpre	AM	70.6	70.6	0.0	No
	PM	70.9	71.0	0.1	No
EB Fountain between Vine and El Centro	AM	64.0	64.0	0.0	No
	PM	64.8	64.8	0.0	No
WB Fountain between Vine and El Centro	AM	63.4	63.4	0.0	No
	PM	63.4	63.4	0.0	No

Source: DKA Planning, 2015.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant with Mitigation Incorporated. Construction of the Project would contribute to cumulative noise levels. As noted earlier, construction activities would significantly increase ambient noise levels at BuzzFeed Motion Pictures Studios. Any other future development that is built concurrently with the Project could further contribute to cumulative temporary increases in ambient noise levels. When considering local impacts, cumulative construction noise impacts are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. There

are 85 proposed developments in the vicinity of the Project site that were identified by the project's traffic study.[163]

- No. 68: 1311 North Cahuenga Blvd., 375 apartment units and 2,500 square feet of commercial use.
- No. 69: 1341 Vine St. 100-room hotel, 282,500 square feet of office uses, and 250 apartment units.
- No. 74 - 1310 Cole Ave. 375 apartment units and 2,800 square feet of creative office.
- No. 76 - 6322 De Longpre. 250 apartment units; 223, 665 square feet of office; 33,000 square feet of retail; and 9,135 square feet of restaurants.

Under a worst-case scenario, if each of these projects were to undergo construction concurrently, cumulative noise impacts could impact sensitive receptors in the vicinity of the proposed project. For example, the project's construction impacts alone would substantially increase ambient noise levels at BuzzFeed Studios by 7.6 dBA. Because concurrent construction from one or more related project would further increase ambient noise levels, these impacts would be considered significant but mitigable for two key reasons. First, the vicinity of the project site is notable for the presence of buildings and structures that would obstruct the line of sight from any other project sites to each of the sensitive receptors analyzed in this study. Without the ability of construction noise to have a direct sound path to these receptors, noise impacts would be substantially attenuated, especially when distance to each receptor is accounted for. Second and most importantly, each project would be expected to comply with the City's noise ordinance requirements that would mandate the application of best available control measures consistent with those identified in **Mitigation Measures 12-1** through **12-6**. This would substantially reduce maximum noise levels from each construction site from these related projects.

With regard to off-site construction-related noise impacts, haul trucks and other on-road vehicles could generate noise. This addition of any truck trips would marginally increase ambient noise along haul route roadways, as truck deployment onto local streets would not happen simultaneously, but rather be phased over the course of site preparation, grading, and construction phases. Off-site noise would not increase substantially from project traffic and is considered less than significant.

Mitigation Measures 12-1 through **12-6** would reduce the Project's noise impact from on-site construction activity to less-than-significant levels. Further, appropriate mitigation of the construction impacts of the other related projects in the vicinity of the four sensitive receptors analyzed in this study would substantially reduce noise impacts below the 5 dBA audible threshold of significance. Specifically, the use of noise-attenuating exhaust mufflers on construction equipment and the erection of temporary sound barriers for any future related projects near the Project site would properly mitigate noise impacts

[163] *Overland Traffic Consultants, Inc., Traffic Impact Analysis for Tommie Hotel; November 2015.*

on sensitive receptors. **Mitigation Measure 12-7** would minimize movement of haul trucks along residential streets and toward roadways with fewer sensitive receptors.

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 expose people residing or working in the project area to excessive noise levels?

No Impact. The Project is not within an airport hazard area.[164] The Project Site is not located within two miles of a public airport. The nearest airports are Los Angeles International Airport (LAX) located 11 miles southwest, Santa Monica Airport located 9 miles southwest, Bob Hope-Burbank Airport located 7.5 miles north. As such, the Project would not expose future residents or employees to excessive airport-related noise levels.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not in the vicinity of a private airstrip. As a result, the Project will not expose future residents or employees to excessive noise levels from any private airstrip.

[164] *ZIMAS search for 1400 Cahuenga: http://zimas.lacity.org/*

13. POPULATION AND HOUSING

a) Would the project induce substantial 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 Impact. A significant impact would occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction Impacts

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts will not result from construction of the Project. Therefore, construction-related population growth impacts will be less than significant.

Operational Impacts

Population generation is shown in Table 3.13-1 and employee generation is shown in Table 3.13-2. It is estimated that the Project would generate approximately 0 residents and approximately 80 employees (net after the removal of the existing use).

Table 3.13-1
Project Estimated Population Generation

Land Use	Quantity	Population Generation Rates	Total Population
Existing Uses			
Residential (removed)	0 DU	2.81 person / DU	0
Project			
Residential	0 DU	2.81 person / DU	0
		Total Increase in Population	**0**

Note: DU = dwelling unit
Source: The 2010 Census also shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf.
Table: CAJA Environmental Services, August 2015.

Table 3.13-2
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees
Existing (to be removed)			
Office	10,659 sf	4.79 employees / 1,000 sf	(51)
Project			
Hotel	175 rooms	1.13 employees / 1,000 sf	62
Restaurant	5,043 sf	13.3 employee / 1,000 sf	67
Retail	600 sf	2.71 employees / 1,000 sf	2
Total Increase in Employees (Proposed – Existing)			**80**

Note: sf = square feet
Source: LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table 11:
Office is Standard Commercial Office rate.
Hotel is Lodging rate. The lodging area is approximately 55,000 sf.
Retail is Neighborhood Shopping Centers rate.
The Justification Study does not provide restaurant rates. A representative rate is from RCLCO assumptions for Millennium Hollywood Draft EIR.
Table: CAJA Environmental Services, October 2015.

Localized Growth Forecasts

The following tables provide different geographic scales of population and housing, from the community plan and citywide. This acknowledges that growth does not occur in a vacuum but in a larger context.

Table 3.13-3 Population and Households in the City of Los Angeles, lists the 2010 and 2015 population, households, and subsequent persons/housing ratio, the SCAG forecast for 2020 and 2035, as well as the number and percent change.

Table 3.13-4 shows the Southern California Association of Government's (SCAG) planned growth of the City of Los Angeles in population, housing, and employment from 2012 to 2020.[165]

Table 3.13-5, Population and Households in the Hollywood Community Plan Area, provides data from Hollywood Community Plan, adopted in 1988, and the more recent 2014 Growth and Infrastructure Report.

[165] *The 2012 data was from a May 2013 report and profile. The 2020 projection was from the 2012 RTP adopted April 2012.*

Table 3.13-3
Population and Households in the City of Los Angeles

Year	Population	Households	Persons/Household
2010	3,792,621	1,412,006	2.69
2015	3,957,022	1,440,779	2.75
2020	3,991,700	1,455,700	2.74
2035	4,320,600	1,626,600	2.66
Change 2010 to 2015			
Number Changed	+164,401	+28,773	+0.06
Change 2015 to 2020			
Number Changed	+34,678	+14,921	-0.01
Change 2015 to 2035			
Number Changed	+363,578	+185,821	-0.09

2010: Census data, reported 4/1/2010.

2015: As of January 1, 2015, Department of Finance: http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php.

2020 and 2035: Based on the adopted 2012-2035 Regional Transportation Plan by SCAG, page 32: http://rtpscs.scag.ca.gov/Documents/2012/final/SR/2012fRTP_GrowthForecast.pdf.

Table: CAJA Environmental Services, August 2015.

Table 3.13-4
SCAG Population, Housing and Employment of the City of Los Angeles

	Population	Housing (units)	Employment (jobs)
2012	3,825,297	1,418,581	1,688,584
2020	3,991,700	1,455,700	1,817,700
Change (2012-2020)	+166,403	+37,119	+29,116

2012: SCAG Local Profile for City of Los Angeles, dated May 2013: http://www.scag.ca.gov/Documents/LosAngeles.pdf

2020: SCAG Adopted 2012 RTP Growth Forecast, adopted April 2012: http://www.scag.ca.gov/DataAndTools/Pages/GrowthForecasting.aspx

Table: CAJA Environmental Services, August 2015.

Table 3.13-5
Population and Housing Units in the Hollywood Community Plan Area

	2010 (Projection)	2010 Census	2014 Estimate	Change 2010-2014
Population	219,000	198,228	207,644	+ 9,416
Housing Units	n/a	103,187	105,212	+ 2,025

2010 Projection from 1988: Hollywood Community Plan, page HO-3: http://planning.lacity.org/complan/pdf/HwdCpTxt.pdf. This has been superseded by 2010 Census data.

2010 Census: Census data, reported 4/1/2010.

2014 Estimate: Department of City Planning, Demographics Research Unit, Population/Housing Estimate, July 1, 2014.

Table: CAJA Environmental Services, August 2015.

The July 2015 unemployment rate is Los Angeles-Long Beach-Glendale area is approximately 7.5 percent.[166] Thus, there is an unmet demand for jobs. The jobs produced by the Project would be service jobs that could be filled by the existing unemployment rate. The type of jobs produced are not unique to the area or region (such as skilled, technical or unique work) and it would be unlikely that employees would move to the area or induce population growth to fill the job demand.

The Project would not conflict with SCAG's projections, the City's projections, or represent any population or housing increase. As discussed in the Air Quality and Utilities and Service Systems sections of this IS/MND, the Project is consistent with SCAG's growth projections which are based on macroeconomic data and socioeconomic variables independent of parcel-level land use designation and zoning. The Project would not add housing. The Project is not of the size and scope that it would induce substantial population growth and is not a project of statewide, regional, or area wide significance, according to CEQA Guidelines Section 15206(b). The Project would be less than significant impact to population and housing growth.

Housing Element

The City updated its Housing Element portion of the General Plan for the period of 2013-2021. On December 3, 2013, the City Council adopted the update to the Housing Element of the General Plan.[167] The Housing Element provides the number of housing units each community must plan and accommodate during the 8-year period is called the Regional Housing Needs Assessment (RHNA) allocation. The Housing Element does not alter the development potential of any site in the City, nor modify land use of

[166] *Bureau of Labor Statistics: http://www.bls.gov/eag/eag.ca_losangeles_md.htm, August 27, 2015.*

[167] *City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm*

the Zoning Code. It also does not undermine, in any way, neighborhood planning efforts such as Community Plans, Specific Plans or Historic Preservation Overlay Zones. While the State requires the City to evaluate and plan for the existing capacity to accommodate future projected growth, the Housing Element does not have any material effect on development patterns, nor specify areas for increased height or density.[168] The Housing Element has identified 2,024 sites (662.1 acres) in the Hollywood Community Plan Area as having the housing capacity for 24,185 net additional units.[169] The Project Site does not contain housing. The Project would not add housing units and not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.[170]

Infrastructure Impacts

The Project Site is currently developed with buildings and is located within an urbanized area in the City. Thus, the construction of potential growth-inducing roadway or other infrastructure extensions would not be required. The Project would not induce substantial population growth and would be supported by the existing infrastructure such as roadways. Impacts will be less than significant.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing housing. Therefore, no impact will occur.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing occupied housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing housing. Therefore, no impact will occur.

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[168] *City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm*

[169] *City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.*

[170] *City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.*

14. PUBLIC SERVICES

This section is based on the following letters, included as Appendix F of this IS/MND:

F-1 Response from Los Angeles Police Department, October 15, 2015.

F-2 Response from Los Angeles Unified School District, August 18, 2015.

F-3 Response from Los Angeles Public Library, November 3, 2015.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:

i) Fire protection?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project, and a new or physically altered fire station would be necessary. LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. A total of 1,104 uniformed firefighters (included 242 serving as Firefighters/Paramedics), are always on duty at 106 neighborhood fire stations located in the LAFD's 471-square-mile jurisdiction.[171] Pursuant to Table 507.3.3 of the 2014 Fire Code, the maximum response distance between high density residential and commercial land use and a LAFD station that houses an engine company[172] is 1.5 mile and truck company[173] is 2 miles, response distances that if exceeded require the installation of an automatic fire sprinkler system.[174] The Project Site is served by several fire stations, as shown in Table 3.14-1, Fire Stations.

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[171] *http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf*

[172] *LAFD: All LAFD Engines are Triple Combination apparatus, meaning they can pump water, carry hose, and have a water tank: http://lafd.org/about/apparatus*

[173] *LAFD: Aerial Ladder Fire Engines: http://lafd.org/about/apparatus*

[174] *http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf*

Table 3.14-1
Fire Stations

No.	Address	Distance	Equipment	Staff	Ave. Time (Turnout + Travel)	Incident Counts
27	1327 Cole	250 feet	Task Force Ambulance BLS Ambulance Urban Search	14 Firefighters	Non-EMS: 1:08 + 3:31 minutes EMS: 1:18 + 3:53 minutes	Non-EMS: 816 EMS: 3,579
82	5769 Hollywood	1.15 miles	Engine Ambulance	6 Firefighters	Non-EMS: 1:20 + 4:25 minutes EMS: 1:24 + 3:42 minutes	Non-EMS: 481 EMS: 1,989
41	1439 N. Gardner	1.45 miles	Engine Ambulance Brush Patrol	6 Firefighters	Non-EMS: 1:14 + 5:04 minutes EMS: 1:16 + 4:21 minutes	Non-EMS: 639 EMS: 2,188

http://lafd.org/fire_stations/find_your_station and http://lafd.org/fsla/stations-map

Incident counts: year 2015 (January to July). Non-EMS is fire emergency. EMS is emergency medical service.

Response Time: year 2015 (January to July) average time (turnout time + travel time) in the station area.

Response time listed above does not include call processing, which averages 1:02 minutes citywide in 2015. Call processing is done at a central location and does not differ by fire stations.

Fire Department Call Processing Time: The time interval that starts when the call is created in CAD by a Fire Dispatcher until the initial Fire or EMS2 unit is dispatched. Turnout Time: The time interval between the activation of station alerting devices to when first responders put on their PPE3 and are aboard apparatus and en-route (wheels rolling). Both station alarm and en-route times are required to measure this for each unit that responds.

Travel Time: The time interval that begins when the first unit is en route to the incident and ends upon arrival of any of the units first on scene. This requires one valid en-route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events and unspecified incident locations, may impact travel time.

Incident Count: The number of incidents that result in one or more LAFD units being dispatched, regardless of record qualification.

http://lafd.org/sites/default/files/pdf_files/10-15-2014_AllStations.pdf

http://www.lafd.org/about/apparatus: Typically, a Truck Company runs with a single Engine in a configuration called a "Light Force." Or, when running with two engines, the term "Task Force" is used.

Fire Station Directory, March 2014.

Table: CAJA Environmental Services, August 2015.

Response Distance

The Project Site is located within the distance identified by the Fire Code. Station Nos. 27, 82, and 41 are within 1.5 miles away and contain Task Forces (truck company and engine company).[175] The Project would be constructed with fire protection as required by the LAFD Chief, unless other building and safety codes supersede this. Average (or mean) response time can be skewed with a few isolated, abnormal response times. A recommended measure is called a fractile measurement (such as 80 percent), in which

[175] *LAFD Task Force: http://lafd.org/apparatus/111-fire-a-rescue-resources/295-lafd-task-force*

performance is better measured in terms of how well the department is able to achieve the goal as compared to 100 percent of the time. For example, a department would create a performance measurement indicating fire apparatus will arrive at the scene of the dispatched incident within a certain period of time, 80 percent of the time. The distribution of response times (as measured by Incident Creation Time to Time On Scene) for emergency incidents from October 1 2012 through November 20 2013, indicates that in 86% of the incidents, the fastest response time (response time of the first unit on scene) was less than 480 seconds (8 minutes). The 90th percentile of the response time is 538 seconds (just under 9 minutes). Overall, EMS incidents tend to have faster responses than Fire incidents.

- EMS: The 90th percentile of response times city-wide was 534 seconds, while the 90th percentile of travel times was 357 seconds.

- Fire: The 90th percentile of response times city-wide was 564 seconds, while the 90th percentile of travel times was 409 seconds.

Travel time takes significantly longer than the other components, with a mean of 230 seconds city-wide (240 seconds in the North and West bureaus) [WHAT OTHER COMPONENTS? WHAT DOES THIS MEAN?]. The National Fire Protection Association (NFPA) standard is actually phrased in terms of travel time rather than response time, e.g.: "The fire department's fire suppression resources shall be deployed to provide for the arrival of an engine company within a 240-second travel time to 90 percent of the incidents." Travel time is much more variable than dispatch or turnout time, possibly due to the differing distances between responding resource and the incident location and traffic along the way. Furthermore, while dispatch and turnout times are largely under LAFD's control, and can be improved through better training or process design, improving travel time requires changing resource pre-positioning (deployment). The first step in evaluating LAFD's ability to take a structured approach to finding better deployments would be to compare actual travel times to predicted (model-based) travel times.[176] Calls for service vary based on the days of the week and time of the day. There is also variation in fire-related or emergency medical (EMS)-related calls. Of the weekday days, Wednesdays have the lowest number of Fire calls by volume (and Thursdays the highest with Fridays close behind), and Wednesdays and Thursdays have about the same number of EMS calls by volume, the lowest among weekdays (and Fridays the highest). Sundays has the lowest number of calls by volume for both Fire and EMS. The variation between incident rates for Fire is slightly higher than incident rates for EMS calls.[177] The Project is within the maximum response distance of a fire station with adequate equipment. There are additional fire stations located nearby. In addition, there are no plans for new fire stations, and the Project

[176] *Pages 54-59, Fire Department Deployment Resources Study, March 3, 2014: http://lafd.blogspot.com/2014/03/report-affirms-changes-underway-says.html.*

[177] *Pages 48-50, Fire Department Deployment Resources Study, March 3, 2014: http://lafd.blogspot.com/2014/03/report-affirms-changes-underway-says.html.*

would not cause the need for a new station to be built. Impacts related to response distance would be less than significant.

Emergency Access

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site (i.e. Sunset, Ivar, Cahuenga).

- Fire Station 27 would likely pass along Cole Avenue to Cahuenga Boulevard.
- Fire Station 82 would likely pass along Hollywood Boulevard to Cahuenga Boulevard.
- Fire Station 41 would pass along Gardner Avenue to Sunset Boulevard, to Cahuenga Boulevard.

All circulation would be in compliance with the Fire Code, including any access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts related to emergency access would be less than significant.

Fire Flow

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the zoning of the area, type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing. The following fire hydrants are near the Project Site:[178]

- Hydrant (ID 35740, size 4D, 12-inch main) on northwest corner of Cahuenga and De Longpre.
- Hydrant (ID 35746, size 4D, 8-inch main) on southeast corner of Ivar and De Longpre.
- Hydrant (ID 35739, size 4D, 12-inch main) on west side of Cole Avenue.

The fire hydrant locations will be analyzed at the plan check phase. To ensure that fire protection services are adequate within the proposed buildings and around the Project Site, **Mitigation Measure 14-1** would reduce potential impacts on fire protection services to a less than significant level. This measure allow the LAFD to ensure that the Project will not increase demand on the fire department to the extent that a new

[178] *Navigate LA, City of Los Angeles, Bureau of Engineering, DWP (Fire Hydrants) Layer: http://navigatela.lacity.org/index01.cfm*

or expanded facility is needed, the construction of which may cause a significant impact on the environment.

Mitigation Measures

14-1 Public Services (Fire)

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

ii) Police protection?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. The Project Site is served by the City of Los Angeles Police Department's (LAPD) West Bureau, which oversees LAPD operations in the Hollywood, Olympic, Pacific, West LA, and Wilshire communities.[179] The Hollywood Community Police Station, located at 1358 Wilcox Avenue, is approximately 500 feet driving distance from the Project Site. The boundaries of the Hollywood Area are as follows: Mulholland Drive, Griffith Park boundary to the north; Los Angeles City boundary, Melrose Avenue to the south; Normandie Avenue, Griffith Park boundary to the east; and Los Angeles City boundary to the west. Each police station area is divided into smaller Reporting Districts (RD). The Project Site is within RD 666, which has an area as follows: Sunset to the north, Santa Monica to the south, Seward Street to the west, and Gower Street to the east.[180]

Deployment

Deployment of police officers to existing area stations in the City is based on a number of factors and is not calculated solely based on police-need-per-population standards. The LAPD presently uses a quantitative workload model, known as Patrol Plan, to determine the deployment level in each of the area stations. Patrol Plan, which was developed by a private consultant, is a computer program which

[179] *LAPD, West Bureau: http://www.lapdonline.org/west_bureau*

[180] *LAPD: http://assets.lapdonline.org/assets/pdf/Hollywood_RD_Mar14.pdf*

mathematically formulates 25 data variables (factors) to provide patrol officer deployment recommendations for the 18 geographic areas in the City to meet predetermined constraints (response time and available time). These factors include patrol speed, number of units fielded, forecast call rate, percent of calls with 1-6+ units dispatched, average service time, dispatching policy, percent of calls dispatched by priority, square miles of an area, average travel time and street miles (length of streets, alleys and other routes in an area). Police units are in a mobile state; hence the actual distance between the Station and the Project Site is often of little relevance to service performance. Instead the realized response time is more directly related to the number of officers deployed. Police assistance is prioritized based on the nature of a call. The average response time to emergency calls for service in the Hollywood Area during 2014 was 5.3 minutes. This response time is below the Citywide average that was 6.2 minutes during 2014 and below the seven minute response time that is a set standard of the LAPD. There are approximately 365 sworn officers and 17 civilian support staff in the Hollywood Area.[181]

Crime Rate

Crime statistics for Part 1 (violent and property) are shown in Table 3.14-2, Crimes. The crime rate, which represents the number of crimes reported, affects the "needs" projection for staff and equipment for the LAPD to some extent.

Table 3.14-2
Crimes

Type of Crime	Hollywood Area	Citywide
Homicide	7	232
Rape	107	1,306
Robbery	325	7,122
Aggravated Assault	423	10,596
Burglary	385	12,427
Motor Vehicle Theft	418	12,421
Burglary Theft from Vehicle	1,043	21,733
Person/Other Theft	1,377	25,149
Total Part 1	**4,085**	**90,986**
Year to date crime rate for week ending October 17, 2015:		
http://assets.lapdonline.org/assets/pdf/cityprof.pdf		
http://assets.lapdonline.org/assets/pdf/hwdprof.pdf		
Table: CAJA Environmental Services, October 2015.		

[181] *LAPD response, October 15, 2015.*

Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site to keep out the curious. The sides along the streets and alley need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services (see **Mitigation Measure 14-2**). These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. This measure would reduce potential construction impacts on police protection services to a less than significant level.

Operational Impacts

The Project Site would have an increase in visitors and patrons, especially over the evening hours due to the hotel and retail uses. As such, the Project could potentially increase in the number of police service calls due to an increase in onsite persons. The potential for crime can be reduced with site specific designs and features (see **Mitigation Measure 14-3**). The Project would create a security plan and include standard security measures such as adequate security lighting, secure key access to hotel rooms, secured onsite parking, and valet parking, and front desk that offers a visual deterrent and human surveillance feature. The Project would provide the LAPD commanding officer of the Hollywood Area a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response (see **Mitigation Measure 14-4**). The Project would not require the construction of a new or expanded police station. There is a large police station one block away. **Mitigation Measures 14-2, 14-3,** and **14-4** would reduce the impacts associated with police services to a less than significant level.

Mitigation Measures

14-2 Public Services (Police – Demolition/Construction Sites)

Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

14-3 Public Services (Police)

The plans shall incorporate a design that enhances the security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, and location of toilet facilities or building entrances in high-foot traffic areas. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department.

Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

14-4 Upon completion of the Project, the Hollywood Area commanding officer shall be provided with a diagram of each portion of the property. The diagram shall include access routes and any additional information that might facilitate police response.

iii) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for additional school facilities. The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:[182]

- Selma Elementary School (K-5), located at 6611 Selma Avenue. Los Angeles, CA 90028
- Bancroft Middle School (6-8), located at 929 N. Las Palmas Avenue, Los Angeles, CA 90038
- Hollywood High School (9-12), located at 1521 North Highland Avenue, Los Angeles, CA 90028

Each of the schools' enrollments and capacities are shown in Table 3.14-3. There are no anticipated new schools planned for the area.

Table 3.14-3
LAUSD Schools Enrollments and Capacities

Name	Current Capacity [1]	Resident Enrollment [2]	Actual Enrollment [3]	Current Overage/ (Shortage) [4]	Overcrowded Now? [5]	Projected Capacity [6]	Projected Enrollment [7]	Future Overage/ (Shortage) [8]	Overcrowding Future? [9]
Selma Elementary	250	193	204	57	No	488	148	340	No
Bancroft Middle	939	756	876	183	No	1,334	782	552	No
Hollywood High	1,835	1,149	1,568	686	No	2,191	938	1,253	No

Note: Current and projected enrollments/capacities reflect data from School Year (SY) 2013-2014. Current and projected data are updated annually and become available after February 1st of each calendar.
[1] School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet program.
[2] The total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.
-Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment

[182] *Written response with Rena Perez, LAUSD, August 18, 2015. Included in Appendices.*

Table 3.14-3
LAUSD Schools Enrollments and Capacities

Name	Current Capacity [1]	Resident Enrollment [2]	Actual Enrollment [3]	Current Overage/ (Shortage) [4]	Overcrowded Now? [5]	Projected Capacity [6]	Projected Enrollment [7]	Future Overage/ (Shortage) [8]	Overcrowding Future? [9]

capacities.

-A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1 TRK).

[3] The number of students actually attending the school now, including magnet students.

[4] Current seating overage or (shortage): equal to (current capacity) - (resident enrollment).

[5] Current overcrowding status of school or service area. The school or area is currently overcrowded if any of these conditions exist:

-A school is currently on a multi-track calendar.

-There is currently a seating shortage.

-There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats.

[6] School planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a 2-semester (1 TRK) calendar. Includes capacity allocated to by charter co-locations. Includes capacity for magnet programs.

[7] Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.

[8] Projected seating overage or (shortage): equal to (projected capacity) - (projected enrollment).

[9] Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:

-A school remains on a multi-track calendar.

-There is a seating shortage in the future.

-There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

Source: Written response from Rena Perez, LAUSD, August 18, 2015. Included in the Appendices.

Table by CAJA Environmental Services, August 2015.

As shown on Table 4.14-4, the Project (indirectly through its employees) would generate an increase of approximately 13 elementary, 3 middle, and 6 high school students, for a total increase of approximately 24 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD. Selma Elementary, Bancroft Middle, and Hollywood High all have adequate capacity now and in the future to accommodate the Project. Therefore impacts related to enrollment would be less than significant.

Proximity to Schools

The nearest school is: [183]

[183] *Navigate LA, Schools Layer: http://navigatela.lacity.org/navigatela/*

- Arshag Dickranian Armenian School, 1200 Cahuenga Boulevard, approximately 1,100 feet south.

The school would still be generally shielded from the Project Site by the distance and intervening residential and commercial buildings between the school and the Site. These intervening structures and redundant street network ensure that construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Construction activities would be limited to on-site work. Therefore, no impact would occur.

Table 3.14-4
Project Estimated Student Generation

Project		Students Generated			
Source	**Quantity**	**Elementary**	**Middle**	**High**	**Total**
Residential units	0	0	0	0	0
Employees	80	13	3	6	22

Residential land uses: Elementary:0.4 students per household; Middle: 0.1 students per household; High: 0.2 students per household

Commercial and Industrial land uses: 0.2691 students per employee. Note that there is no breakdown by elementary, middle, or high. Therefore the same ratio as residential, 4:1:2, is used.

Source (rates): LAUSD 2012 Developer Fee Justification Study, February 9, 2012.

Table: CAJA Environmental Services, August 2015.

School Fees

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. 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). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, impacts related to schools would be less than significant.

iv) Parks?

Less Than Significant Impact. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. Table 3.14-5, Parks and Recreation Centers lists the LADRP parks and recreation centers that are located nearby the Project Site. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons). The Project would generate 0 residents (directly and indirectly, since as state above, the types of jobs created would not be unique to induce new population or movement to the area) and approximately 80 employees (net after the removal of the existing uses). However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. In addition, the hotel patrons and visitors are also unlikely to frequent parks. The Project would feature the following facilities for hotel patrons: fitness center and pool. Since the Project would not be including any housing or any permanent residents, there would be no required open space elements and no expected use of existing park facilities. Therefore, impacts would be less than significant.

Table 3.14-5
Parks and Recreation Centers

Name	Address	Acres	Features
Selma Park	6567 Selma Ave.	1.37	Playground, Open Space
De Longpre Park	1350 Cherokee Ave.	1.37	Playground, Open Space
Hollywood Recreation Center	1122 Cole Ave.	3.12	Auditorium, basketball, children's play area, community room.
Las Palmas Senior Center	1820 Las Palmas Ave.	1.14	Community Center
Poinsettia Recreation Center	7341 Willoughby Ave.	6.29	Baseball, basketball, children's play area, handball, indoor gym), tennis courts.
Yucca Community Center	6671 Yucca St.	0.97	Basketball, children's play area, picnic table, soccer
Pan Pacific Park	7600 Beverly Blvd.	32.18	Auditorium, barbecue, baseball, basketball children's play area, indoor gym, picnic tables
Wattles Garden Park	1850 Curson Ave.	47.58	Community garden, hiking trails, Japanese garden, mansion, stream/brook, tea house
Runyon Canyon Park	2000 Fuller Ave.	136.76	Children's play area, hiking trail, off-leash dog area

NavigateLA with Recreation and Parks Department layer: http://navigatela.lacity.org/index01.cfm
Table: CAJA Environmental Services, August 2015.

v) Other public facilities?

No Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the Project Site. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library 8 regional branches, and 64 community branches. The LAPL collection has 6.4 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.[184] On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for community with less than 45,000 population, 14,500 square feet for community with more than 45,000 population, and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.

Table 3.14-6 describes the libraries that would serve the Project. There are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community.[185] The Project would generate 0 residents (directly and indirectly, since as state above, the types of jobs created would not be unique to induce new population or movement to the area) and approximately 80 employees (net after the removal of the existing commercial uses). However, employees of commercial developments do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours. In addition, the hotel patrons and visitors are also unlikely to frequent the library. Since the Project would not be including any housing or any permanent residents, they would not be expected use to existing library facilities. Therefore, there would be no impact.

Table 3.14-6
Los Angeles Public Libraries

Name	Address	Size (sf)	Volumes/Circulation	Current Service	Staff
Goldwyn Hollywood Branch	1623 Ivar Ave.	19,000	87,182 / 123,539	78,944	10
Durant Branch	7140 Sunset Blvd.	12,500	47,727 / 138,968	25,657	8
Fremont Branch	6121 Melrose Ave.	7,361	40,452 / 99,181	30,896	6.5
Wilshire Branch	149 N. St Andrews	6,258	33,988 / 107,838	50,715	6.5
Cahuenga Branch	4591 Santa Monica	10,942	40,733 / 116,099	48,435	6.5
Los Feliz Branch	1874 Hillhurst Ave.	10,449	50,220 / 185,658	44,639	7.5
Fairfax Branch	161 S. Gardner St.	12,500	52,262 / 209,707	48,435	8

[184] *LAPL website: http://www.lapl.org/about-lapl/press/2012-library-facts*

[185] *Written response from Thomas Jung, LAPL, November 3, 2015. Included in the Appendices.*

Staffing is full-time equivalent. Current Service – 2010 Census.
The LAPL does not make targeted projections but rather uses the most recent Census figures to determine if a branch should be constructed in a given area, according to the new Branch Facilities Plan.
Source: Written response from Thomas Jung, LAPL, November 3, 2015. Included in the Appendices.
Table: CAJA Environmental Services, November 2015.

15. RECREATION

a) Would the project 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 Impact. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities. The Project would generate 0 residents and approximately 80 employees (net after the removal of the existing uses). However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. In addition, the hotel patrons and visitors are also unlikely to frequent parks. The Project would feature the following facilities for hotel patrons: fitness center and pool. There would be no increased residents, which could lead to physical deterioration of facilities or accelerate deterioration. Therefore, a less than significant impact would occur.

b) Does the project 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 Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The Project would generate 0 residents and approximately 80 employees (net after the removal of the existing uses). However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. In addition, the hotel patrons and visitors are also unlikely to frequent parks. The Project would feature the following facilities for hotel patrons: fitness center and pool. There would be no increased residents, which could require the construction or expansion of recreation facilities. Therefore, a less than significant impact would occur.

16. TRANSPORTATION AND TRAFFIC

This section is based on the following report and letter, included as Appendix G of this IS/MND:

G-1 Traffic Impact Analysis for Tommie Hotel, Overland Traffic Consultants, Inc., January 2016.

G-2 LADOT Approval Letter, From Los Angeles Department of Transportation to Los Angeles Department of City Planning, received on January 26, 2016.

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if roadways and intersections that would carry project-generated traffic would exceed adopted City of Los Angeles Department of Transportation (LADOT) thresholds of significance.

The LADOT reviewed the traffic study and determined that none of the study intersections would be significant impacted by project-related traffic. The Project would be subject to the Project Requirements included in the LADOT Approval Letter.

Study Scope

The Traffic Impact Analysis has been conducted using the procedures adopted by the City of Los Angeles Department of Transportation (LADOT) to analyze the potential traffic impacts of new development projects. The intersections were evaluated using the LADOT Critical Movement Analysis (CMA) methodology. The CMA methodology calculates the operating conditions of each individual study intersection using a ratio of peak hour traffic volume to the intersection's capacity. Any change to the intersection's peak hour operating condition caused by an increase/decrease in traffic volume can be quantified (i.e. traffic impact) using this analysis methodology. Potential traffic impacts caused by a project that exceeds limits established by the City of Los Angeles as specified by LADOT are identified. Any potentially significantly impacted intersections are then evaluated for possible traffic mitigation measures. Pursuant to the City of Los Angeles traffic impact guidelines, the following steps have been taken to develop the existing and future traffic volume estimate:

(a) New traffic counts were conducted on December 4, 2013, April 9, 2014, May 20, 2015, August 25, 2015, and September 16, 2015. The counts conducted prior to 2015 were increased by 1% per year to account for potential growth in the area to year 2015;

(b) Traffic in (a) + the Project traffic (existing + Project);

(c) Traffic in (b) + proposed traffic mitigation, if necessary;

(d) Existing + ambient growth to 2018 (added additional 1% per year);

(e) Traffic in (d) + related Projects (future "without Project" scenario);

(f) Traffic in (e) with the proposed Project traffic (future "with Project" scenario);

(g) Traffic in (f) + the proposed traffic mitigation, if necessary.

A CMA analysis of the existing and future traffic conditions analysis has been completed at those locations expected to have the highest potential for significant traffic impacts. Morning and evening peak hour conditions have been evaluated at twelve (12) key signalized intersections and three (3) unsignalized locations. It should be noted that future traffic conditions include the potential construction of 85 other land development projects (related projects) in the general vicinity of the Project site. The signalized intersections analyzed in this study are:

1. Highland Avenue and Sunset Boulevard;

2. Highland Avenue and Santa Monica Boulevard;

3. Cahuenga Boulevard and Hollywood Boulevard;

4. Cahuenga Boulevard and Sunset Boulevard;

5. Cahuenga Boulevard and De Longpre Avenue;

6. Cahuenga Boulevard and Fountain Avenue;

7. Cahuenga Boulevard and Santa Monica Boulevard;

8. Vine Street and Hollywood Boulevard;

9. Vine Street and Sunset Boulevard;

10. Vine Street and De Longpre Avenue;

11. Vine Street and Fountain Avenue; and,

12. Vine Street and Santa Monica Boulevard.

The unsignalized study locations are:

1. Fountain Avenue and McCadden Place;

2. Fountain Avenue and Las Palmas Avenue; and,

3. Ivar Avenue and De Longpre Avenue.

Existing Transportation Facilities Setting

The City of Los Angeles Mobility Plan 2035 was approved by the City Planning Commission and adopted by City Council during 2015. The Mobility Plan dictates the street standards and designations within the plan area. The Project will be subject to the Mobility Plan.

The Project is in the Hollywood area of Los Angeles, which is serviced by the Hollywood Freeway (US-101). This is a regional north-south freeway to the east of the Project. This freeway links to numerous other freeways in the vicinity providing extensive regional access. The Hollywood Freeway is accessible via Hollywood Boulevard, Sunset Boulevard, Cahuenga Boulevard, Gower Street and Highland Avenue. The freeway is approximately one mile west of the Project Site and approximately ¾ mile north of the Project Site. The Hollywood Freeway carries approximately 213,000 vehicles per day (VPD) with 12,800 vehicles per hour (VPH) during peak periods.

Cahuenga Boulevard is a north-south roadway designated as a Modified Avenue I north of Franklin Avenue and as a Modified Avenue I south of Franklin Avenue by the City of Los Angeles Mobility Plan 2035. Cahuenga Boulevard provides two lanes in each direction and a bike lane in the Project area. Left turns from north and southbound Cahuenga Boulevard to Hollywood Boulevard are prohibited during the evening peak hours.

De Longpre Avenue is an east-west roadway designated as a Local street the City of Los Angeles Mobility Plan 2035. De Longpre Avenue provides one lane in each direction in the Project vicinity. The roadway is a not continuous in the project area. It extends from Formosa Avenue to Gower Street in the immediate project area. De Longpre creates the southern boundary of the project site. A Local street requires a 60-foot right-of-way and 36-foot roadway. The Project site frontage along De Longpre Avenue is currently 55-feet at the westerly end and 60-feet of right-of-way at the easterly end of the site. A 5-foot dedication may be required along the westerly end of the De Longpre Avenue Project site.

Ivar Avenue creates the eastern boundary of the Project Site. Ivar Avenue is designated as a Modified Local street in the City of Los Angeles 2035 Mobility Element. A Modified Local street requires an 80-foot right-of-way and 56-foot roadway. The Project site frontage along Ivar Avenue is currently 65-feet of right-of-way width. A 7.5-foot half street dedication may be required along the Ivar Avenue Project frontage.

An alley creates the northern boundary of the Project site. The City of Los Angeles requires a full width alley to be 20-feet. The current right-of-way along the alley is 10-feet. The project may be required to provide a 5-foot half alley dedication along the Project's alley frontage.

Fountain Avenue is an east-west roadway designated as Collector street in the City of Los Angeles Mobility Plan 2035. Fountain Avenue provides one lane in each direction in the Project vicinity. Fountain Avenue extends from La Cienega Boulevard to Hyperion Boulevard.

Highland Avenue is a north-south roadway designated as an Avenue I between Cahuenga Boulevard and Melrose Avenue by the City of Los Angeles Mobility Plan 2035. Three lanes in each direction are provided in the Project area during peak hours. Left turn lanes are provided at major intersections.

Hollywood Boulevard is an east-west roadway designated as an Avenue I by the City of Los Angeles Mobility Plan 2035. Two lanes in each direction are provided in the Project area. Hollywood Boulevard extends from Crescent Heights Boulevard to Vermont Avenue in the Hollywood community area.

Santa Monica is an east-west State Highway 2 in the project area. The road is designated as a Modified Avenue I in the City of Los Angeles Mobility Plan 2035. Two lanes in each direction are provided in the Project area.

Sunset Boulevard is an east-west roadway designated as an Avenue I in the Mobility Plan 2035. Sunset Boulevard provides three lanes in each direction in the Project area. One-hour time limited metered parking is provided during off-peak hours.

Vine Street is a north-south roadway designated as an Avenue II in the City of Los Angeles Mobility Plan 2035. Two lanes in each direction are provided in the Project area. The roadway extends from the Hollywood Freeway at Franklin Avenue to Melrose Avenue where it changes name to Rossmore Avenue.

Project Traffic Generation

Traffic-generating characteristics of many land uses including the existing office and the proposed hotel, restaurant and retail has been surveyed by the Institute of Transportation Engineers (ITE). The results of the traffic generation studies have been published in a handbook titled Trip Generation, 9th Edition. This publication of traffic generation data has become the industry standard for estimating traffic generation for different land uses. The ITE studies indicate that the use and the size associated with the existing office and proposed hotel, restaurant and specialty retail use generally exhibit the trip-making characteristics as shown by the trip rates in Table 3.16-1, Traffic Generation Rates.

Table 3.16-1
Traffic Generation Rates

ITE Code	Description	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
310	Hotel	8.17	0.53	59%	41%	0.60	51%	49%
826	Specialty Retail	44.32	6.54	48%	52%	2.71	44%	56%
932	High-turnover restaurant	127.15	10.81	55%	45%	9.85	60%	40%
710	Office	11.03	1.56	88%	12%	1.49	17%	83%

Rates are per hotel room or 1,000 sf.
Table 1 in Traffic Impact Study, Overland Traffic Consultants, January 2016.
Table: CAJA Environmental Services, March 2016.

The ITE rates are estimated without regard for the nature of the Project's components interaction between the land uses. For instance, it is likely that numerous patrons of the restaurant and retail will also be staying at the hotel. A conservative 10% internal trip reduction has been taken to account for this trip reduction activity. In addition, the ITE rates are estimated without regard for the nature of the Project's vicinity in terms of transit and walking or interaction with the traffic on the surrounding roadways. Considering the multiple transit opportunities, walkability and expanding cycling infrastructure in the city, it is anticipated that employees and patrons will make use of these options to single occupant vehicles. A 10% reduction was incorporated into the analysis for the restaurant and retail components of this project for this activity.

Many land uses are visited on the way to or from another main destination point. The greater the regional draw the lower the pass-by activities. LADOT has established passby credits for several land uses. A 10% pass-by reduction has been incorporated into the analysis for the proposed retail and a 20% reduction has been incorporated into the analysis for the restaurant as approved by LADOT. These reductions are not taken at the nearby intersection of Cahuenga Boulevard and De Longpre Avenue because employees and patrons may need to make turning movements at these intersections to access the site. It is estimated that the Project will conservatively generate a potential increase of 1,748 daily trips with 115 trips during the morning peak hour and 123 trips during the evening peak hour after trips credits. Table 3.16-2 displays the estimated Project trip generation.

Table 3.16-2
Estimated Project Traffic Generation

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Proposed								
Hotel	175 rooms	1,430	93	55	38	105	54	51
Specialty Retail	600 sf	27	4	2	2	2	1	1
Internal Trips	10%	(3)	(0)	(0)	(0)	(0)	(0)	(0)
Transit/Walk	10%	(2)	(0)	(0)	(0)	(0)	(0)	(0)
Pass-by	10%	(2)	(0)	(0)	(0)	(0)	(0)	(0)
Subtotal Retail		20	4	2	2	2	1	1
Restaurant	5,043 sf	641	55	30	225	50	30	20
Internal Trips	10%	(64)	(6)	(3)	(3)	(5)	(3)	(2)
Transit/Walk	10%	(58)	(5)	(3)	(2)	(5)	(3)	(2)
Pass-by	20%	(104)	(9)	(5)	(4)	(8)	(5)	(3)
Subtotal Restaurant		415	35	19	16	32	19	13
Subtotal Proposed		**1,866**	**132**	**76**	**56**	**139**	**74**	**65**

Existing (to be removed)								
Office	10,659 sf	118	17	15	2	16	3	13
Net Total		**1,748**	**115**	**61**	**54**	**123**	**71**	**52**

Table 2 in Traffic Impact Study, Overland Traffic Consultants, January 2016.
Table: CAJA Environmental Services, March 2016.

The Project will also be providing valet service. The valet service trips will be provided on the project site. There will be on entry and one exit driveway off of De Longpre Avenue. Patrons will drive in the entry drive and turn their vehicle over to valet services. The valet service personnel will then take the vehicle to the subterranean parking garage. These additional vehicle trips have been added to the evaluation of the potential traffic impacts.

Trip Distribution and Assignment of Project Traffic

A primary factor affecting a Project's trip direction is the locations of the potential origin and destination points that would generate Project trips. This is where the hotel, retail and restaurant patrons and employees are coming from and going to. The estimated Project directional trip distribution is also based on the study area roadway network, freeway locations, traffic flow patterns in and out of this area of the City of Los Angeles and consistency with previously approved traffic studies for this area of Los Angeles.

Figure 4, Overall Project Distribution Percentage, included in the Traffic Impact Analysis, as Appendix G-1 to this MND, illustrates the estimated area wide Project traffic distribution percentages. Figure 5, Project Distribution Percentages, included in the Traffic Impact Analysis, as Appendix G-1 to this MND, shows the estimated Project traffic percentages detailed at each of the selected study intersections. Using the traffic assignment at each intersection and the estimated peak hour traffic volume as provided in the Table 3.16-2, peak hour traffic volumes at each study location have been calculated and are shown in Figure 6 for the development (included in the Traffic Impact Analysis, as Appendix G-1 to this MND). This estimated assignment of the Project traffic flow provides the information necessary to analyze the potential traffic impacts generated by the Project at the study intersections.

Analysis of Existing Traffic Conditions

Traffic volume data used in the following peak hour intersectional analysis were based on traffic counts conducted by National Data Systems, an independent traffic data collection company. Traffic counts were conducted on December 4, 2013, April 9, 2014, May 20, 2015, August 25, 2015, and September 16, 2015. Traffic counts were increased by 1% per year for counts taken prior to 2015 to account for potential traffic growth in the area from the day the data was collected to current year 2015. The count days were typical weekdays when there were no holidays, no rain and schools were in session. Traffic counts were conducted during the morning peak and evening peak hours. The highest single hour during each of the peak periods was used in this analysis. Existing traffic counts are provided in Figure 7 and 8 for the AM

and PM peak hours respectively (figures included in the Traffic Impact Analysis, as Appendix G-1 to this MND).

The traffic conditions analysis of the currently signalized locations was conducted using the Critical Movement Analysis (CMA) methodology. The study intersections were evaluated using this methodology pursuant to the criteria established by the City of Los Angeles Department of Transportation for signalized intersections. The existing peak hour traffic counts were used along with intersection lane configurations and traffic controls to determine the intersection's current operating condition. The CMA procedure uses a ratio of the intersection's traffic volume to its capacity for rating an intersections congestion level. The highest combinations of conflicting traffic volume (V) at an intersection are divided by the intersection capacity value. Intersection capacity (C) represents the maximum volume of vehicles that have a reasonable expectation of passing through an intersection in one hour under typical traffic flow conditions.

The CMA procedure uses a ratio of the traffic volume to the capacity of an intersection. This volume-to-capacity (V/C) ratio defines the proportion of an hour necessary to accommodate all the traffic moving through the intersection assuming full capacity. V/C ratios provide an ideal means for quantifying intersection operating characteristics. For example, if an intersection has a V/C value of 0.70, the intersection is operating at 70% capacity with 30% unused capacity.

Once the volume-to-capacity ratio has been calculated, operating characteristics are assigned a level of service grade (A through F) to estimate the level of congestion and stability of the traffic flow. The term "Level of Service" (LOS) is used by traffic engineers to describe the quality of traffic flow. Definitions of the LOS grades are shown in Table 3.16-3, Level of Service Definitions.

Reductions for traffic signal improvements in the area are included in the analysis. The area currently has Automated Traffic Surveillance and Control (ATSAC) systems improvements which increase capacity at the intersection through computer aided signal progression. The City of Los Angeles has determined that this type of improvement increases capacity by approximately 7%. The City has supplemented the signal systems in the Project area of Hollywood with an upgrade to the ATSAC system, which includes advance loop detection at the intersections and system wide progression computer programming with system wide interaction between the traffic signals. This system is known as the Adaptive Traffic Control System (ATCS) system. An additional 3% capacity increase is estimated with this signal system. The existing and future traffic conditions analysis with and without the Project include ATSAC and ATCS because both signal systems are installed at all the study intersections. Most study intersections had high pedestrian volumes or up-stream delays during the PM or both AM and PM peak hours. The intersection capacity was reduced to account for this activity.

Table 3.16-3
Level of Service Definitions

LOS	V/C Ratio	Operating Conditions
A	0.00 - 0.60	At LOS A, there are no cycles that are fully loaded, and few are even close to loaded. No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turning movements are easily made, and nearly all drivers find freedom of operation.
B	> 0.60 – 0.70	LOS B represents stable operation. An occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel somewhat restricted with platoons of vehicles.
C	> 0.70 – 0.80	In LOS C stable operation continues. Full signal cycle loading is still intermittent, but more frequent. Occasionally drivers may have to wait through more than one red signal indication, and back-ups may develop behind turning vehicles.
D	> 0.80 – 0.90	LOS D encompasses a zone of increasing restriction, approaching instability. Delays to approaching vehicles may be substantial during short peaks within the peak period, but enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive back-ups.
E	> 0.90 – 1.00	LOS E represents the most vehicles that any particular intersection approach can accommodate. At capacity (V/C = 1.00) there may be long queues of vehicles waiting upstream of the intersection and delays may be great (up to several signal cycles).
F	> 1.00	LOS F represents jammed conditions. Back-ups from location downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration; hence, volumes carried are not predictable. V/C values are highly variable, because full utilization of the approach may be prevented by outside conditions.

Source: Table 4, Traffic Impact Study, Overland Traffic, January 2016.
Table by CAJA Environmental Services, March 2016.

By applying the CMA procedures to the intersection data, the V/C values and the corresponding Levels of Service (LOS) for existing traffic conditions were determined at the study intersections.

Analysis of Existing + Project Conditions

An evaluation has been conducted to evaluate potential Project impacts to the existing conditions. According to the standards adopted by LADOT and described in their August 2014 Traffic Study Policies and Procedures, a traffic impact is considered significant if the related increase in the V/C value equals or exceeds the thresholds shown in the Table 3.16-4.

The potential impact for existing plus Project was conducted by adding the Project traffic to the existing traffic. The existing and existing + Project traffic conditions were compared to determine if the thresholds of significance in Table 3.16-4 were exceeded. As noted in Table 3.16-6, CMA Summary (located later in this section), no significant impacts occur when the Project's traffic generation is added to the existing conditions.

Table 3.16-4
Significant Impact Criteria, City of Los Angeles

LOS	Final V/C Value	Increase in V/C Value
C	0.701 – 0.800	+ 0.040
D	0.801 – 0.900	+ 0.020
E and F	> 0.901	+ 0.010 or more

No significant impacts occur at LOS A or B because intersections operations are good and can accommodate additional traffic growth.
Source: Table 6, Traffic Impact Study, Overland Traffic, January 2016.
Table by CAJA Environmental Services, March 2016.

Analysis of Future Traffic Conditions

Future traffic volume projections have been developed to analyze the traffic conditions after completion of other planned land developments including the proposed Project. Pursuant to the City of Los Angeles traffic impact guidelines, the following steps have been taken to develop the future traffic volume estimate:

(a) Existing traffic December 4, 2013, April 9, 2014, May 20, 2015, August 25, 2015, and September 16, 2015 conditions increased by 1% per year for 2015 for counts not taken in 2015;

(b) Traffic in (a) + ambient growth (1 % per year increase per LADOT based on LA County CMP 2010) to year 2018;

(c) Traffic in (b) + related Projects (without Project scenario);

(d) Traffic in (c) with the proposed Project traffic (with Project scenario);

(e) Traffic in (d) + the proposed traffic mitigation, if necessary.

The future cumulative analysis includes other development Projects located within the study area that are either under construction or brought to the attention of the City as planned for future development. As part of this analysis, the related Project information was obtained from the City of Los Angeles Department of Transportation and City of Los Angeles Department of City Planning[186] and City of West Hollywood. It should be noted that this Project or any actions taken by the City regarding this Project, does not have a direct bearing on the other proposed related projects. The locations of the related Projects are shown in Figure 9 (included in the Traffic Impact Analysis, as Appendix G-1 to this MND) and

[186] *From LADOT Case Files and Planning Website, Updated October 30, 2015.*

described in Table 3.16-5, Related Projects. The number of trips added to the area by the related projects alone is displayed in Figure 10 (included in the Traffic Impact Analysis, as Appendix G-1 to this MND).

To evaluate future traffic conditions with the related project, estimates of the peak hour trips generated were developed. The potential traffic growth in the future at the study intersections has been determined by adding the existing traffic volume, ambient traffic growth of 1% per year and traffic from the other related development projects. This is a conservative analysis because CEQA Guidelines Section15130 requires a list or growth percentage and the analysis is doing both. Future cumulative "without project" peak hour traffic volume estimates are shown in Figure 11 for the AM Peak Hour and Figure 12 for the PM Peak Hour (figures included in the Traffic Impact Analysis, as Appendix G-1 to this MND).

Table 3.16-5
Related Projects

No.	Project	Size	Location
1	Television Center Health Club Expansion Warehouse to Studio Office	 9,992 sf 3,120 sf	6311 Romaine Street
2	Daycare Kindergarten	4,480 sf	7002 Clinton Street
3	Student housing Faculty/Staff housing Retail	224 units 16 units 12,700 sf	1460 Gordon Street
4	Hotel Restaurant Restaurant (to be removed)	80 rooms 15,920 sf (9,838 sf)	6381 Hollywood Boulevard
5	Office	130,000 sf	956 Seward Street
6	Hotel	225 rooms	1800 Argyle Avenue
7	Hollywood Center Studios Office Storage	 104,155 sf 1,970 sf	6601 Romaine Street
8	Theater Office (Pantages)	214,000 sf	6225 Hollywood Boulevard
9	Apartments	43 units	7045 Lanewood
10	Apartments Condominiums	21 units 36 units	1149 Gower
11	Apartments High-Turnover Restaurant Office Fast food Restaurant Health Club Retail	200 units 23,500 sf 422,500 sf 2,000 sf 15,000 sf 16,500 sf	6121 Sunset Boulevard
12	Residential Retail	1,042 units 175,000 sf	6200 Hollywood Boulevard

	Live-Work	24 units	
13	Apartments Retail	151 units 6,200 sf	6100 Hollywood Boulevard
14	Condominiums Retail Restaurant Office Park	311 units 5,000 sf 8,500 sf 40,000 sf 1 acre	5935 Sunset Boulevard
15	Apartments Market	179 units 33,500 sf	915 N. La Brea Avenue
16	Office	85,000 sf	6516-6526 Selma
17	Office/Studio	535,396 sf	5800 Sunset Boulevard
18	Residential Retail	76 units 2,500 sf	1411 Highland Avenue
19	Office Retail	121,609 sf 2,613 sf	1601 Vine Street
20	Apartments Office Workspace Live-Work	108 units 13,442 sf 6,177 sf 8 units	6230 Yucca Street
21	Apartments Retail Restaurant	786 units 12,700 sf 9,500 sf	6677 Santa Monica Boulevard
22	Hotel Restaurant Pool Deck Bar/Lounge	114 rooms 5,979 sf 6,000 sf	6417 W. Selma Avenue
23	Office Restaurant	4,074 sf 10,402 sf	6523 Hollywood Boulevard
24	Affordable Apartments	66 units	1603 Cherokee Avenue
25	Restaurant Special Events Bar/Lounge Office	11,400 sf 6,100 sf 9,400 sf 3,000 sf	6608 Hollywood Boulevard
26	Apartments Retail	306 units 68,000 sf	1540 N. Vine Street
27	Hollywood Cherokee Apartments	225 units	1718-1730 Las Palmas 1719-1727 Cherokee
28	Millennium Hollywood Apartments Hotel Health Club Office Retail	461 units 254 rooms 80,000 sf 264,303 sf 100,000 sf	1740 N. Vine Street

	Restaurant	2,500 sf	
29	Apartments Retail	248 units 14,710 sf	1610 N. Highland Avenue
30	New Hotel	118 rooms	1133 N. Vine Street
31	Apartments	118 units	1824 N. Highland Avenue
32	Hotel	100 rooms	1841 N. Highland Avenue
33	Office	240,000 sf	959 N. Seward Street
34	Apartments Restaurant	44 units 2,900 sf	7120 W. Sunset Boulevard
35	Tutoring Center	100 students	927 N. Highland Avenue
36	Apartments	100 units	712 N. Wilcox Avenue
37	Office Retail	88,750 sf 12,000 sf	936 N. La Brea Avenue
38	Temple Israel School	79 students	7300 Hollywood Boulevard
39	Apartments Retail	278 units 12,500 sf	5550 Hollywood
40	Apartments Retail	437 units 378,000 sf	5651 Santa Monica Boulevard
41	Paramount Studios Sound Stage Stage Support Production Office General Office Retail	 21,000 sf 1,900 sf 635,500 sf 638,100 sf 64,200 sf	5555 W. Melrose Avenue
42	Target Store Retail	163,862 sf 30,887 sf	5520 Sunset Boulevard
43	Pharmacy	15,000 sf	5500 Hollywood Boulevard
44	Hotel Restaurant Meeting Rooms Restaurant	220 units 13,004 sf 1,432 sf 1,020 sf	1541 Wilcox Avenue
45	Retail Office	15,000 sf 47,000 sf	925 La Brea Avenue
46	Retail Office	26,000 sf 274,000 sf	5901 Sunset Boulevard
47	All Suites Hotel Ground Floor Commercial 2nd Floor Restaurant	195 rooms 24,000 sf 4,200 sf	6611-6637 Hollywood Boulevard
48	Apartments Restaurant Office	200 units 23,500 sf 422,500 sf	6121 Sunset Boulevard
49	Apartments	68 units	5245 Santa Monica Boulevard

	Retail	51,674 sf	
50	Apartments Retail	98 units 30,000 sf	100 Western Avenue
51	Coffee/Donut Shop	806 sf	859 Highland Avenue
52	Office Retail	169,463 sf 24,200 sf	1546 Argyle Avenue
53	Apartments Restaurant Coffee/Donut Shop Retail	254 units 1,200 sf 860 sf 2,000	1350 Western Avenue
54	Apartments Apartments Hotel Retail/Restaurant	731 units 598 units 250 rooms 27,000 sf	6201 Sunset Boulevard
55	Hotel	80 rooms	5600 Hollywood
56	Apartments Commercial	169 units 40,000 sf	904 La Brea Avenue
57	Apartments Office Retail	200 units 32,125 sf 4,700 sf	6230 Sunset Boulevard
58	Apartments	84 units	707 Cole
59	Hotel Restaurant/Bar	159 rooms 2,900 sf	1921 Wilcox
60	Apartments	89 units	1717 Bronson Avenue
61	Hotel	69 rooms	1525 Cahuenga Boulevard
62	Apartments Commercial	161 units 4,747 sf	5750 Hollywood Boulevard
63	Apartment Restaurant	76 units 3,000 sf	901 Vine Street
64	Hollywood Central Park Amphitheater Offices Commercial Restaurant Café Bed and Breakfast Inn Community Center (library, police substation, classrooms, event space)*	38 acres 500 seats 7,500 sf 7,500 sf 21,500 sf 750 sf 5 rooms 30,000 sf	101 Freeway, from Hollywood Boulevard to Santa Monica Boulevard
65	Retail Office	15,000 sf 74,154 sf	926 Sycamore
66	Apartments Restaurant	247 units 5,000 sf	6901 Santa Monica Boulevard

	Retail	10,000 sf	
67	Tao Restaurant Retail	20,624 sf 6,000 sf	6421-6429 Selma Avenue
68	Apartment Commercial	375 units 2,500 sf	1311 Cahuenga
69	Hotel Office Apartment	100 rooms 282,500 sf 250 units	1341 Vine Street
70	Apartments Retail	293 units 33,980 sf	5525 Sunset Boulevard
71	Mixed Use	53,940 sf	1745 Western
72	Café and Market Commercial Office	18,000 sf	1915 Highland Avenue
73	Crossroads Hollywood Hotel Retail, restaurant, entertainment Office Residential	308 rooms 185,000 sf 95,000 sf 950 units	4 blocks bounded by Selma Avenue, Sunset Boulevard, Highland, Church property
74	Apartments Creative Office	375 units 2,800 sf	1310 Cole
75	Hotel Retail	221 rooms 1,893 sf	6409 Sunset Boulevard
76	Office Apartments Retail Restaurant	223,665 sf 250 sf 33,000 sf 9,135 sf	6322 De Longpre
77	Apartments	88 units	525 N Wilton Place
78	McCadden Campus LGBT Center Affordable Housing	65,847 sf 140 units	1119-1139 McCadden and 6719-6733 Santa Monica
79	Restaurant Remove nursery	4,606 sf	1201 La Brea Avenue
80	Condominium	7 units	1257 Detroit St
81	Condominium	5 units	1249 Formosa Av
82	Condominium	7 units	1148 Detroit St
83	Office	113,230 sf	1041 Formosa Ave
84	Condominium Commercial	370 units 22,500 sf	7300 Santa Monica Bl
85	Apartments	8 units	7141 Santa Monica Bl

** No specifics, estimated 20,000 sf library, 1,000 sf police station, 10,000 sf classrooms, 20,000 sf event space.*
Source: Table 8, Traffic Impact Study, Overland Traffic, January 2016.
Table by CAJA Environmental Services, March 2016.

The traffic conditions created by the ambient traffic growth plus the other related development projects are shown in Table 3.16-6, CMA Summary (later in this section). Comparing the changes in the traffic conditions between the future without Project and future with Project provides the necessary information to determine if the Project's projected traffic increases have the potential to create a significant impact on any of the study intersections.

Project Impacts

Construction

Construction worker vehicles would park in the existing parking lots around the Site and onsite. Temporary impacts to pedestrian safety could occur during construction, especially on Ivar, De Longpre, and Cahuenga The alley is not a highly impacted pedestrian corridor and is primarily used for vehicle access to the adjacent uses. The Project will comply with **Mitigation Measures 16-1** and **16-2**. This measure will ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. The Project would be exporting more than 20,000 cy of material and will obtain a Haul Route Approval. Therefore, impacts would be reduced to less than significance. These intervening structures and redundant street network ensure that construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Construction activities would be limited to on-site work. Construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Haul trucks and delivery trucks would access the Project Site from Cahuenga or Ivar, generally from Sunset, which is not near any schools. The general haul route is described in Section 2, Project Description, of this MND. Therefore, no construction impact would occur.

Operation

Traffic conditions after completion of the Project have been calculated by adding the Project volume to the future without Project traffic volume. The traffic impact of the added Project traffic at the study intersections is shown in Table 3.16-6, CMA Summary, by the comparison of the future without Project and future with Project traffic conditions at the study intersection. The significant impact criteria were applied to the future traffic conditions.

As shown in Table 3.16-6, no significant traffic impacts occur at the study intersections. It should be noted that the impact analysis does not consider any changes to the existing intersection configuration (i.e., future roadway improvements). Future cumulative "with Project" peak hour traffic volumes are shown in Figure 13 for the AM Peak Hour and Figure 14 for the PM Peak Hour (figures included in the Traffic Impact Analysis, as Appendix G-1 to this MND).

Table 3.16-6
CMA Summary

No.	Intersection	Peak Hour	Existing		Existing + Project				Future (2018) No Project		Future (2018) + Project			Significant
			CMA	LOS	CMA	LOS	Impact	Significant	CMA	LOS	CMA	LOS	Impact	
1	Highland Avenue and Sunset Boulevard	AM	0.897	D	0.899	D	+ 0.002	No	1.016	F	1.018	F	+ 0.002	No
		PM	0.861	D	0.862	D	+ 0.001	No	1.052	F	1.054	F	+ 0.002	No
2	Highland Avenue and Santa Monica Boulevard	AM	0/797	C	0.800	D	+ 0.003	No	1.079	F	1.082	F	+ 0.003	No
		PM	0.835	D	0.839	D	+ 0.004	No	1.160	F	1.161	F	+ 0.001	No
3	Cahuenga Boulevard and Hollywood Boulevard	AM	0.797	C	0.801	D	+ 0.004	No	0.973	E	0.977	F	+ 0.004	No
		PM	0.651	B	0.653	B	+ 0.002	No	0.898	D	0.901	E	+ 0.003	No
4	Cahuenga Boulevard and Sunset Boulevard	AM	0.793	C	0.800	D	+ 0.007	No	0.932	E	0.939	E	+ 0.007	No
		PM	0.710	C	0.714	C	+0.004	No	1.011	F	1.016	F	+ 0.005	No
5	Cahuenga Boulevard and De Longpre Avenue	AM	0.472	A	0.501	A	+ 0.029	No	0.626	B	0.662	B	+ 0.036	No
		PM	0.508	A	0.520	A	+ 0.012	No	0.701	C	0.713	C	+ 0.012	No
6	Cahuenga Boulevard and Fountain Avenue	AM	0.663	B	0.676	B	+ 0.013	No	0.803	D	0.808	D	+ 0.005	No
		PM	0.656	B	0.662	B	+ 0.006	No	0.850	D	0.856	D	+ 0.006	No
7	Cahuenga Boulevard and Santa Monica Boulevard	AM	0.728	C	0.735	C	+ 0.007	No	0.889	D	0.896	D	+ 0.007	No
		PM	0.635	B	0.642	B	+ 0.007	No	0.886	D	0.893	D	+ 0.007	No
8	Vine Street and Hollywood Boulevard	AM	0.760	C	0.762	C	+ 0.002	No	0.868	D	0.870	D	+ 0.002	No
		PM	0.725	C	0.734	C	+ 0.009	No	0.817	D	0.825	D	+ 0.008	No
9	Vine Street and Sunset Boulevard	AM	0.785	C	0.798	C	+ 0.013	No	0.881	D	0.894	D	+ 0.013	No
		PM	0.856	D	0.857	D	+ 0.001	No	0.995	E	0.996	E	+ 0.001	No
10	Vine Street and De Longpre Avenue	AM	0.485	A	0.491	A	+ 0.006	No	0.634	B	0.640	B	+ 0.006	No
		PM	0.557	A	0.569	A	+ 0.012	No	0.728	C	0.735	C	+ 0.007	No
11	Vine Street and Fountain Avenue	AM	0.711	C	0.714	C	+ 0.003	No	0.812	D	0.815	D	+ 0.003	No
		PM	0.772	C	0.774	C	+ 0.002	No	0.905	E	0.907	E	+ 0.002	No
12	Vine Street and Santa Monica Boulevard	AM	0.866	D	0.869	D	+ 0.003	No	0.983	E	0.985	E	+ 0.002	No
		PM	0.869	D	0.874	D	+ 0.005	No	0.987	E	0.992	E	+ 0.005	No

Source: Tables 7, 9, and 10, Traffic Impact Study, Overland Traffic, January 2016.
Table by CAJA Environmental Services, March 2016.

Traffic Signal Analysis

The intersections of Fountain Avenue and McCadden Place, Fountain Avenue and Las Palmas Avenue and De Longpre Avenue and Ivar Avenue were evaluated for the potential future need for a traffic signal. The traffic control for the intersections are currently stopped in all four directions (all-way stop control). The State of California has established "Warrants" to determine if traffic signal control is required at an intersection. The signal analysis was conducted incorporating size of the community, traffic volumes, lane configurations, speed limits, distance to other controls, peak hour delay, accidents, number of pedestrians and bicyclists, and percentage of trucks.

It is common traffic engineering practice to use the Signal Warrant Analysis as a tool to determine if a traffic signal is needed. Meeting one or even more than one traffic signal warrant does not necessarily mean that a traffic signal is the best solution to improve traffic conditions at a location. Other items are also considered including potential degradation to progression, alternative improvements such as widening or other traffic controls. The input information for the signal analysis is similar to the intersection analysis. A minimum of eight hours of traffic data are considered for potentially meeting traffic signal warrants. The eight hours of traffic data collected was entered into the software, comparisons to the relevant tables and graphs were conducted to determine if a traffic signal was warranted. The traffic lanes, traffic volumes, trucks, pedestrians, bicycles, peak hour factor as indicated in the count information and the count information + project were used in the signal analysis. A brief explanation of each of the warrants1 is provided below.[187]

Warrant 1 – Eight-Hour Vehicular Volume

There are two conditions for this warrant. Condition A is the Minimum Vehicular Volume Warrant intended for applications at intersections where a large volume of traffic is the principal reason to consider a new traffic signal. Condition B is the Interruption of Continuous Traffic intended for use at intersection where the Minimum Vehicular Volume warrant is not likely to be met but the main street volumes are high and create excessive delay or conflict for minor street traffic. Either or both conditions may be met for this warrant to be satisfied.

Warrant 2 – Four Hour Vehicular Volume

This warrant's conditions are intended to be met when the high volume of peak hour intersecting traffic is the primary reason for the need of a traffic signal. Four hours of data are evaluated under this warrant.

Warrant 3 – Peak Hour

[187] *Based on Warrants 8 User Guide – Copyright 2011 Trafficware Ltd. Page 5-29*

The Peak Hour Warrant is intended for use at a location where the minor street encounters undue delay when entering or crossing the major street for a at least one hour of a typical day.

Warrant 4 – Pedestrian Volume

Two conditions are required to be met for the Pedestrian Volume warrant to be considered met. At least 100 pedestrians are required for a minimum of four hours or at least 190 pedestrians within one hour. The second condition checks if a new signal will restrict traffic flow and if there are adequate gaps for pedestrians to cross. The Pedestrian Volume warrant is intended for use when high volumes of pedestrians encounter extensive delay in crossing a high volume major street.

Warrant 5 – School Crossing

This warrant is for use when school children are crossing a major street. The age group of the pedestrians crossing this intersection was not collected. Therefore, in order to attempt a conservative evaluation of the intersection, all pedestrians were considered school children for this warrant analysis. The School Crossing Warrant is intended for use where school children crossing the intersection are the primary reason for considering installation of a new traffic signal.

Warrant 6 – Coordinated Signal System

Occasionally, in order to maintain proper progressive movement of vehicles through a signal system, it is necessary to install a new traffic signal at a location where it would not otherwise be necessary.

Warrant 7 – Crash Experience

Locations where there are frequent and severe accidents are occasionally considered for installation for a traffic signal if such installation will reduce the frequency and/or severity of the accidents.

Warrant 8 – Roadway Network

This Warrant uses information from Warrants 1, 2 and 3. It would be met if the new traffic signal would encourage concentration and organization of traffic flow on a roadway network.

Signal warrants analysis was conducted under future conditions without the Project and with the Project. Signal warrant analysis of the intersection of all three intersections indicates that none of the traffic signal warrants are met with the future traffic conditions with the Project. The detailed signal warrant sheets are provided in included in the Traffic Impact Analysis, as Appendix G-1 to this MND. A summary of the findings is presented in Table 3.16-7.

Table 3.16-7
Summary of Warrant Analysis

	Future Without Project			Future With Project		
	Fountain / McCadden	Fountain / Las Palmas	De Longpre / Ivar	Fountain / McCadden	Fountain / Las Palmas	De Longpre / Ivar
Warrant 1 Eight-Hour Vehicular Volume	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met
Warrant 2 Four-Hour Vehicular Volume	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met
Warrant 3 Peak Hour	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met
Warrant 4 Pedestrian Volume	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met
Warrant 5 School Crossing	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met
Warrant 6 Coordinated Signal System	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met
Warrant 7 Crash Experience	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met
Warrant 8 Roadway Network	Not Met	Not Met	Not Met	Not Met	Not Met	Not Met

Source: Table 11, Traffic Impact Study, Overland Traffic, January 2016.
Table by CAJA Environmental Services, March 2016.

Traffic Impact Study Conclusion

The added traffic volume generated by the Project will not significantly impact the traffic flow at any of the signalized study intersections. Construction impacts would be reduced to less than significant levels with **Mitigation Measures 16-1** and **16-2.** No operational mitigation is required and operational impacts would be less than significant.

Mitigation Measure

16-1 Transportation (Haul Route)

- The developer shall install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety.
- Projects involving the import/export of 20,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety.
- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain

adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc) from work space and vehicular traffic, and overhead protection, due to sidewalk closure or blockage, at all times.

16-2 Pedestrian Safety

- Temporary pedestrian facilities should be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility

- Covered walkways should be provided where pedestrians are exposed to potential injury from falling objects.

b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. A significant impact may occur if the adopted Los Angeles County Metropolitan Transportation Authority (Metro) thresholds for a significant project impact would be exceeded. The Congestion Management Program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network that includes all state highways and some arterials within the County of Los Angeles.

Impacts on Regional Transportation System

The Congestion Management Program (CMP) was adopted to monitor regional traffic growth and related transportation improvements. The CMP designated a transportation network including all state highways and some arterials within the County to be monitored by local jurisdictions. If LOS standards deteriorate on the CMP network, then local jurisdictions must prepare a deficiency plan to be in conformance with the program. Local jurisdictions found to be in nonconformance with the CMP risk the loss of state gas tax funding. For purposes of the CMP LOS analysis, an increase in the freeway volume by 150 vehicles per hour during the am or pm peak hours in any direction requires further analysis. A substantial change in freeway segments is defined as an increase or decrease of 2% in the demand to capacity ratio when at LOS F. For purposes of CMP intersections, an increase of 50 vehicles or more during the AM or PM Peak requires further analysis.

The intersection of Santa Monica and Highland Avenue is the nearest CMP intersection. This CMP intersection is approximately three quarters of a mile from the Project Site. It is anticipated that a conservative maximum of 10% of Project trips will go through the intersection during the peak periods which would equate to 17 trips during the PM Peak Hour. This is below the CMP significance threshold 50 vehicles or more added during the peak hours. The Project volumes on the area freeways are

anticipated to be dispersed throughout the system. The Project is closest to the Hollywood Freeway. It is anticipated that, conservatively, no more than 20% of the Project volumes will be using any one segment of the freeway. The maximum number of freeway trips on any one freeway would then be 34 vehicles during the peak hours. This amount of traffic is below the threshold needed for further evaluation. No CMP intersection or freeway impacts are anticipated. Therefore, the Project would have a less than significant impact.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to the Project only if it were an aviation-related use. The Project Site does not contain any aviation-related uses and the Project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the Project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Pedestrian Safety

Temporary impacts to pedestrian safety could occur during construction, especially on Ivar, De Longpre, and Cahuenga. The alley is not a highly impacted pedestrian corridor and is primarily used for vehicle access to the adjacent uses. This measure will ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. The Project would be exporting 33,000 cy of material and will obtain a Haul Route Approval. The Project will comply with **Mitigation Measures 16-1** and **16-2** listed above. Therefore, impacts would be reduced to less than significance.

Proximity to a School

The nearest school is: [188]

- Arshag Dickranian Armenian School, 1200 Cahuenga Boulevard, approximately 1,100 feet south.

[188] *Navigate LA, Schools Layer: http://navigatela.lacity.org/navigatela/*

The school would still be generally shielded from the Project Site by the distance and intervening residential and commercial buildings between the school and the Site. These intervening structures and redundant street network ensure that construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Construction activities would be limited to on-site work. Construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Haul trucks and delivery trucks would access the Project Site from Cahuenga or Ivar, generally from Sunset, which is not near any schools. The study intersections (which currently could include bus routes) would operate at less than significant levels. There would be no impact.

During operation, the Project would include a vehicle drop off area along De Longpre, which is a Local street with no sensitive uses or safety risks (such a school or residence) across the street. Vehicle access would be via a driveway on Ivar, which is a Modified Local Street, which carries more traffic and provides good sightlines for a driveway. Loading areas would be from the north alley. The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site.

Access & Circulation

The Project will provide at-least code required parking (with deductions for bicycle replacement) for the Project at the site in a subterranean level accessed from Ivar Avenue. If the number of rooms or square foot of the commercial components is reduced, the parking may be reduced accordingly. No parking impacts are anticipated because the Project satisfies code requirements. The Project would have a rear loading dock accessed from the ally, near Cahuenga Boulevard. Emergency access to the Site would be provided by the existing roadway system, including Sunset and Cahuenga. The Project will not result in inadequate emergency access to the Project Site or surrounding area because no intersections would be significantly impacted due to the Project. Access, including driveway widths and aisles would comply with LAMC and Fire Code access requirements. Impacts related to emergency access would be less than significant.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. A significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Public Transit

The Los Angeles County Metropolitan Transportation Authority (Metro) provides bus service via Metro bus lines 2/302 and 210. The Metro Red Line provides rail service to Downtown Los Angeles, Koreatown, Hollywood, and North Hollywood. The Site is approximately 2,000 feet southwest of the Hollywood/Vine Station. Los Angeles Department of Transportation (LADOT) provides bus service via the DASH Hollywood and Beachwood Canyon lines at the corner of Sunset and Vine Street.[189]

Transit Analysis

The Project is forecast to generate approximately 1,748 weekday daily trips with 115 trips during the AM Peak Hour and 123 trips during the PM Peak. As per Congestion Management Program (CMP) 2008 guidelines person trips can be estimated by multiplying the total trips generated by 1.4. The trips assigned to transit may be calculated by multiplying the person trips generated by 3.5%. The CMP Transit trip generation calculation is displayed in Table 3.16-8. This level of transit increase is not expected to adversely affect the current ridership of the transit services in the area. The Project would not create any significant impacts on the transit facilities.

Table 3.16-8
Transit Trips

Trips	Daily	AM Peak Hour	PM Peak Hour
Project Trips	1,748	115	123
Person Trips (x 1.4)	2,447	161	172
Transit Trips (person trips x 3.5%)	**86**	**6**	**6**
Source: Table 13, Traffic Impact Study, Overland Traffic, January 2016. *Table by CAJA Environmental Services, March 2016.*			

Bicycles

The City of Los Angeles adopted a 2010 Bicycle Master Plan to encourage alternative modes of transportation throughout the City of Los Angeles. The Master Plan was developed to provide a network system that is safe and efficient to use in coordination with the vehicle and pedestrian traffic on the City street systems. The Master Plan has mapped out the existing, funded and potential future Bicycle Paths, Bicycle Lanes, and Bicycle Routes. A brief definition of the bicycle facilities is provided below:

- Bicycle Path – A bicycle path is facility that is separated from the vehicular traffic for the exclusive use of the cyclist (although sometimes combined with a pedestrian lane). The designated path can be

[189] *LADOT, DASH Hollywood: http://www.ladottransit.com/dash/routes/hollywood/hollywood.php*

completely separated from vehicular traffic or cross the vehicular traffic with right-of-way assigned through signals or stop signs.

- Bicycle Lane – A bicycle lane is typically provided on street with a designated lane striped on the street for the exclusive use of the cyclist. The bicycle lanes are occasionally curbside, outside the parking lane, or along a right turn lane at intersections.

- Bicycle Route – A bicycle route is a designated route in a cycling system where the cyclist shares the lane with the vehicle. Cyclist would follow the route and share the right-of-way with the vehicle.

The City of Los Angeles Mobility Plan 2035 has identified a Bicycle Enhanced Network. The Mobility Plan indicates that Tier 2 bicycle lanes are more likely to be built by 2035 than Tier 3 lanes. This plan entails roadways be improved with bike detectors at actuated signals.

Cahuenga Boulevard is identified as part of the neighborhood bikeway network. Hollywood Boulevard, Sunset Boulevard, and Cahuenga Boulevard are all identified as study corridors for bikeways.

Municipal code 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. A hotel is required to provide one short term bicycle space per 20 guest rooms and one long term bicycle space per 20 guest rooms. Commercial uses (restaurant and retail) require one short term and one long term bicycle space per 2,000 square feet of floor area. Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. Bicycle parking would be provided pursuant to the LAMC. As shown in Table 2-3, Bicycle Parking Required, in Section 2 of this IS/MND, the Project will provide, at a minimum, 13 short term and 13 long term bicycle spaces. However, by using a 10% bike reduction for vehicle parking, there is a need for an additional 36 bike spaces (9 cars x 4/stall). Thus, the 26 required spaces is increased by 36 for a total of 62 spaces (31 short-term and 31 long-term). The Project would not impede development of bicycle facilities from the Master Plan and would provide adequate bicycle parking. Therefore, impacts to bicycles would be less than significant.

Pedestrian Facilities

Construction activities are expected to be fully contained within the Project Site and are not expected to impede access to the sidewalks around the Site. Temporary fencing will be provided to protect pedestrians from the construction site activities (see **Mitigation Measures 16-1** and **16-2**). During operation, the Project would not impact any sidewalks. There is a controlled/lighted crosswalk at the intersection of Cahuenga / De Longpre and an uncontrolled crossing at Ivar / De Longpre. There are no public benches or seating along the sidewalks around the Site. The Project will not conflict with public transit, bicycles, or pedestrian facilities. Therefore, a less than significant impact will occur.

17. UTILITIES AND SERVICE SYSTEMS

This section is based on the following letters, included as Appendix H of this IS/MND:

H-1 Response from Los Angeles Bureau of Sanitation, September 3, 2015.

H-2 Response from Los Angeles Department of Water and Power, December 16, 2015.

H-3 Response from Southern California Gas Company, July 20, 2015.

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. A significant impact may occur if a project would discharge wastewater whose content exceeds the regulatory limits established by the governing agency. The Los Angeles Water Quality Control Board (LAWQCB) implements programs to protect all waters in the coastal watersheds for Los Angeles and Ventura counties. LAWQCB's Water Quality Control Plan for the Los Angeles Region (the "Basin Plan") establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.[190] Wastewater reclamation and treatment in the City of Los Angeles is provided by the City of Los Angeles Department of Public Works' Bureau of Sanitation (LABS), which operates two treatment plants (Hyperion and Terminal Island) and two water reclamation plants in accordance with the treatment requirements of the LAWQCB and/or water reclamation requirements of the Basin Plan.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP)[191], which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment,[192] and currently treats an average daily flow of approximately 362 mgd.[193] Thus, there is a remaining capacity of approximately 88 mgd. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LAWQCB's discharge policies for Santa Monica Bay. Additionally, the City's Sewer Allocation Ordinance (Ordinance No. 166,060)

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[190] *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region (4)(adopted June, 1994, updated July 2006).*

[191] *LA Sewers: http://www.lasewers.org/treatment_plants/about/index.htm, August 27, 2015.*

[192] *Los Angeles Sanitation: http://www.lacitysan.org/irp/Wastewater.htm, August 27, 2015.*

[193] *LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: http://www.lacitysan.org/wastewater/factsfigures.htm, August 27, 2015.*

limits the annual increase in wastewater flow to HTP to five mgd.[194] This allocation allowance is monitored by the HTP and the Project's contribution would not affect the amount. As shown on Table 3.18-1, Cumulative Estimated Wastewater Generation, it is estimated the Related Projects will generate a net total of approximately 2.01 mgd of wastewater. The Project represents 1.0 percent of the cumulative total. Further, the HTP is a public facility and is, therefore, subject to the state's wastewater treatment requirements. The Project's hotel and commercial discharge is typical of the area and would not require any on-site treatment before flowing to the sewer. Therefore, the Project would have a less than significant impact with regard to wastewater treatment.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Wastewater Generation, Treatment Facilities, and Existing Infrastructure

As shown on Table 3.17-1, Project Estimated Wastewater Generation, it is estimated the Project will generate a net total of approximately 21,669 gallons per day (gpd) (or 0.022 mgd) of wastewater. This is a net total because the gross total was reduced by the wastewater generation of the existing onsite commercial use.

Table 3.17-1
Project Estimated Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Existing (to be removed)			
Office	10,659 sf	120 gallons / 1,000 sf	(1,279)
		Existing	**(1,279)**
Project			
Hotel	175 rooms	120 gallons / room	21,000
Lobby	778 sf	50 gallons / 1,000 sf	39
Gym	542 sf	200 gallons / 1,000 sf	108
Pool	15 x 40 feet	100 gallons / day	273

[194] *Los Angeles City Clerk, Ordinance 166,060:* http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=87-2121

Table 3.17-1
Project Estimated Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Restaurant	5,043 sf	300 gallons / 1,000 sf	1,513
Retail	600 sf	25 gallons / 1,000 sf	15
		Proposed	**22,948**
		Total Increase (Proposed – Existing)	**21,669**

Note: sf = square feet; gpd = gallons per day
Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf.
Retail (less than 100,000 sf) rate used.
Includes amount to fill the pool twice per year, pro-rated by daily amount. Pool water loss due to evaporation is estimated at 100 gallons per day: http://www.americanleakdetection.com/swimming-pool-water-loss-calculator.php
Table: CAJA Environmental Services, December 2015.

The Project Site will be served by LABS, which provides municipal wastewater services to the City. The sewer infrastructure includes:[195]

- 8-inch line on De Longpre Avenue that flows west
- 12-inch line on Cahuenga Boulevard that flows south.

The sewage from the 8-inch line on De Longpre Avenue feeds into a 16-inch line on Seward Street before discharging into a 45-inch sewer line on Willoughby Avenue. The sewage from the 12-inch line joins at Cahuenga Boulevard and feeds into a 21-inch line on Cole Avenue and discharges into the aforementioned 45-inch line on Willoughby.[196]

The Project Site is currently developed and adequately served by the existing wastewater conveyance system. As part of the building permit process the lead agency would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project's wastewater flows. The standard procedure is that further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity (see **Mitigation Measures 17-1**). A final approval for sewer capacity and connection permit will be made

[195] *Navigate LA, Sewer Information Layer: http://navigatela.lacity.org/navigatela/*

[196] *Bureau of Sanitation response, September 3, 2015.*

at that time. Implementation of this mitigation measure would ensure that the Project's impacts to the wastewater conveyance system will be less than significant.

The wastewater generated by the Project will be similar to other hotel and retail uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system (remaining capacity of approximately 88 mgd or at 80 percent capacity), and thus, the increase in wastewater generation would not have a significant impact on treatment plant capacity. As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts with regard to wastewater treatment requirements will be less than significant.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) would be implemented as part of the Project and will help reduce the amount of project-generated wastewater. Therefore, with the mitigation detailed below, impacts to wastewater treatment facilities and existing infrastructure will be less than significant.

Water Consumption and Treatment Facilities

The Los Angeles Department of Water and Power (LADWP) provides municipal water services to the City, and is responsible for providing water to the Project Site. As shown on Table 3.17-2, Project Estimated Water Consumption, it is estimated the Project will consume a net total of approximately 27,767 gallons per day (gpd) (or 0.027 mgd or 31 acre-feet per year[197]) of water. This is a net total because the gross total was reduced by the water consumption of the existing onsite commercial use.

Table 3.17-2
Project Estimated Water Consumption

Land Use	Size	Water Consumption Rates	Total (gpd)
Existing (to be removed)			
Office	10,659 sf	153.6 gallons / 1,000 sf	(1,637)
		Existing	**(1,637)**
Project			
Hotel	175 rooms	153.6 gallons / room	26,880
Lobby	778 sf	64 gallons / 1,000 sf	50
Gym	542 sf	256 gallons / 1,000 sf	139

[197] *1 acre foot = 325,851.429 US gallons. 27,767 x 365 / 325,851 = 31.*

Table 3.17-2
Project Estimated Water Consumption

Land Use	Size	Water Consumption Rates	Total (gpd)
Pool	15 x 40 feet	100 gallons / day	279
Restaurant	5,043 sf	384 gallons / 1,000 sf	1,937
Retail	1,500 sf	32 gallons / 1,000 sf	19
		Proposed	**29,404**
		Total Increase (Proposed – Existing)	**27,767**

Note: sf = square feet; gpd = gallons per day
Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.
Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf.
Retail (less than 100,000 sf) rate used.
Includes amount to fill the pool twice per year, pro-rated by daily amount. Pool water loss due to evaporation is estimated at 100 gallons per day: http://www.americanleakdetection.com/swimming-pool-water-loss-calculator.php
Table: CAJA Environmental Services, December 2015.

The LADWP should be able to provide the domestic needs of the Project from the existing water system. The LADWP cannot determine the impact on the existing water system until the fire demands of the Project are known. Once a determination of the fire demands has been made, LADWP will assess the need for additional facilities, if needed.[198] The Project shall comply with the following measure:

Regulatory Compliance Measure

Fire Water Flow

The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the Proposed Project, and will contact a Water Service Representative at the LADWP to order a SAR. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

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

[198] *Response from Los Angeles Department of Water and Power, December 16, 2015.*

Water Service Area. The designated treatment capacity of 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. The Project's water consumption increase represents approximately 0.05 percent and 0.02 percent of the remaining capacity currently available at LAAFP during the summer and non-summer months, respectively. Therefore, impacts to water treatment facilities and existing infrastructure would be less than significant.

If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. **Mitigation Measure 17-2** will ensure that the Project's impacts to the water conveyance system would be less than significant.

Mitigation Measures

17-1 Wastewater Service

As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project's wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. If street closures for construction are required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety and minimize interruption to the street and sidewalk.

17-2 Water Service

As part of the normal construction/building permit process, the Project Applicant shall confirm with the LADWP Water Service Organization (WSO) that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. If the water infrastructure has insufficient capacity, then the Project Applicant shall be required to build water lines to a point in the system with sufficient capacity. If street closures for construction are required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety and minimize interruption to the street and sidewalk.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of storm water runoff increases to a level exceeding the capacity of the storm drain system serving the Project Site or if a project would substantially increase the probability that polluted runoff would reach the storm drain

system. The Project Site is located in an urbanized area of the City. The Project Site is currently developed with a building and surface parking. The Project will similarly cover the entire site with a building. Thus, the Project would not be altering the amount of impervious surface that affects runoff. Runoff currently flows toward the existing storm drain system, and the Project will not substantially alter the amount of runoff. Impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles, SWRCB, and Low Impact Development requirements. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for polluted runoff to a less than significant level.

d) Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

Water Supply Assessment

State CEQA Guidelines Section 15083.5 requires a lead agency to identify water systems to provide water supply assessments for projects over specified thresholds. For any residential subdivision project Senate Bill (SB) 221 requires that the lead agency include a requirement that a sufficient water supply shall be available to serve the residential development. A residential subdivision is a proposed residential development of more than 500 dwelling units. Thus, the Project is not subject to SB 221 as it does not include a residential development of more than 500 dwelling units. SB 610 requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand for certain development projects that are otherwise subject to CEQA review. Existing law identified those certain projects as follows:

(a) Residential developments of more than 500 dwelling units;

(b) Shopping centers or businesses employing more than 1,000 persons or having more than 500,000 square feet of floor space;

(c) Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet;

(d) Hotels or motels with more than 500 rooms;

(e) Industrial or manufacturing establishments housing more than 1,000 persons or having more than 650,000 square feet of 40 acres;

(f) Mixed use projects containing any of the foregoing; or

(g) Any other project that would have a water demand at least equal to a 500-dwelling unit project.

The Project is not subject to SB 610 as it does not meet the listed requirements because the Project only includes 5,643 square feet of commercial spaces and up to 175 hotel rooms.

Drought Conditions

On January 17, 2014, Governor Jerry Brown officially declared California in a drought emergency. LADWP has activated the Water Conservation Response Unit in order to implement the mandatory Emergency Water Conservation Plan Ordinance - Phase 2. This includes an odd/even numbered address watering calendar. In addition, customers cannot: 1) Use water on hard surfaces such as sidewalks, walkways, driveways, or parking areas (with exception of water brooms); 2) Irrigate landscaping between the hours of 9 a.m. and 4 p.m.; 3) Allow excess water from sprinklers to flood gutters; 4) Use water to clean, fill, or maintain decorative fountains unless the water is part of a recirculation system; 5) Serve water to customers in eating establishments, unless requested; and 6) Allow irrigation leaks to go unattended.[199] The 2010 Urban Water Management Plan takes into account drought conditions. After adjusting for economy and drought conditions, projected water demands can vary by approximately ± 5 percent in any given year due to average historical weather variability. This means that water demands under cool/wet weather conditions could be as much as 5 percent lower than normal demands on average; while water demands under hot/dry weather conditions could be as much as 5 percent higher than normal demands on average.[200]

On April 1, 2015, Governor Brown signed Executive Order B-29-15, which provides actions that will save water, increase enforcement to prevent wasteful water use, streamline the state's drought response, and invest in new technologies to make California more drought resilient. The Executive Order provides water savings by directing the State Water Resources Control Board to implement mandatory water

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[199] *LADWP, Drought Information: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation/a-w-c-droughtbusters?_adf.ctrl-state=nviecbhak_4&_afrLoop=932704326968157*

[200] *2010 Urban Water Management Plan, Los Angeles, pg. 46: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water;jsessionid=b6mMVfCZsTJlyDLQTNnk1Hhr2VQSHFp16ZTTGtNR4R49B8sSS66y!1973388915?_afrLoop=596574118787894&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D596574118787894%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dvzv72rq95_4, August 27, 2015.*

reductions in cities and towns to reduce water usage by 25% or approximately 1.5 million acre-feet. The Executive Order calls for local water agencies to implement conservation pricing to discourage water waste.[201] State mandated conservation and reductions are implemented by LADWP.

The Project is estimated to use approximately 31 acre-feet per year. The 2010 Urban Water Management Plan projects a supply of 614,800 AFY in 2015 and 652,000 AFY in 2020.[202] The Urban Water Management Plan forecasts water demand by estimating baseline water consumption by use (single family, multifamily, 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 2008 SCAG growth forecasts.[203] The 2008 SCAG Growth Forecast Report 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).[204] Neither the Urban Water Management Plan forecasts, nor the 2008 SCAG Growth Forecast Report include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use, and does not proposed a General Plan Amendment or Zone Change. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. As set forth above, the Project is consistent with the General Plan. In addition, the following regulatory compliance measures would ensure that impacts related to the project's water demand remain less than significant:

Regulatory Compliance Measures

Green Building Code

The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's water use.

Landscape

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201 *California Governor: http://gov.ca.gov/news.php?id=18910, accessed August 19, 2015*

202 *2010 Urban Water Management Plan, Los Angeles, pg. 20: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water;jsessionid=b6mMVfCZsTJlyDLQTNnk1Hhr2VQSHFp16ZTTGtNR4R49B8sSS66y!1973388915?_afrLoop=596574118787894&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D596574118787894%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dvzv72rq95_4, August 27, 2015.*

203 *2010 Urban Water Management Plan, Los Angeles, pgs. 42-43:*

204 *SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.*

The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

LID Ordinance and Stormwater BMPs

The Project shall comply with the City of Los Angeles Low Impact Development Ordinance (City Ordinance No. 181,899) and to implement Best Management Practices that have stormwater recharge or reuse benefits for the Project (as applicable and feasible).

e) Would the project 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 Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The Project's generation of 0.021 mgd of wastewater would be sufficiently accommodated as part of the remaining 88 mgd or 80 percent of treatment capacity currently available at HTP. Also, the HTP has sufficient capacity for the Project's flow. Therefore, impacts to wastewater treatment would be less than significant.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. 43 percent of the waste generated in the City is disposed of at the Sunshine Canyon City/County Landfill, with 20 percent to Chiquita Canyon Landfill, and the remaining amounts sent to over a dozen other landfills, recycling, refuse-to-energy, or resource recovery facilities.[205]

Facilities

The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day (tpd) and accepted an average of 7,107 tpd (2012 daily average).[206] It is expected to close in 2034. [207] It has a remaining daily

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[205] *City of Los Angeles, Fact Sheet: Solid Waste Facilities: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf*

[206] *County of Los Angeles Department of Public Works, 2013 Annual Report, May 2015, website: http://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, accessed August 19, 2015.*

intake availability of 4,993 tpd, and has approximately 90.870 million cubic yards (cy) of remaining capacity out of a total capacity of 140.9 million cy.[208] As of September 30, 2013, Sunshine Canyon Landfill accepted approximately 7,800 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).[209] Space is calculated by volume, with 1.7 cubic yards equaling one ton of trash. Projections of capacity are tied to how tightly the trash is compacted.[210] Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 4,300 tpd during each weekday and 9,100 tpd on Saturday.

There are two solid waste transformation facilities within Los Angeles County. The Commerce Refuse-to-Energy Facility has a permitted intake 1,000 tpd and accepted an average of 337 tpd (2013 daily average). It has a remaining daily intake availability of 663 tpd.[211]F The Southeast Resource Recovery Facility, located in the City of Long Beach, has a permitted intake 2,240 tpd and accepted an average of 1,504 tpd (2013 daily average). It has a remaining daily intake availability of 736 tpd.[212]F It is expected that these two facilities will continue to operate at their current permitted capacities through the planning period of 2022. The owners and operators of these facilities have indicated that there are no plans to increase the daily capacity. The County is exploring the use of conversion technologies to reduce future disposal needs as well as address global climate change. These technologies encompass a variety of processes that convert normal household trash into renewable energy, biofuels, and other useful products. The County has launched the Southern California Conversion Technology Demonstration Project, which seeks to promote, evaluate, and establish a demonstration facility for the conversion of solid waste into clean energy.[213] Additionally, the County recently completed its final Phase II Conversion Technology Evaluation Report, which provides a comprehensive study of existing technology suppliers and materials recovery facilities throughout southern California.

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[207] *19 years remaining life as of 2013 Annual Report, prepared in May 2015.*

[208] *State of California Department of Resources Recycling and Recovery, Solid Waste Facility Listing/Details Page, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000), website: http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail, accessed August 19, 2015.*

[209] *Sunshine Canyon Landfill Newsletter, Fall 2013 (latest newsletter), website: http://www.sunshinecanyonlandfill.com/home/newsletter/fall_2013_newsletter.pdf, accessed August 19, 2015.*

[210] *Sunshine Canyon: http://www.sunshinecanyonlandfill.com/home/Future.html, August 27, 2015.*

[211] *County of Los Angeles Department of Public Works, 2013 Annual Report, May 2015, website: https://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, accessed August 19, 2015.*

[212] *County of Los Angeles Department of Public Works, 2013 Annual Report, May 2015, website: https://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, Accessed August 19, 2015.*

[213] *Los Angeles County Phase II Conversion Technology Evaluation Report - October 2007, http://www.socalconversion.org/pdfs/LACo_Conversion_PII_Report.pdf, October 8, 2014.*

Construction

Construction of the Project will generate minimal amounts of construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged. Materials not recycled would be disposed of at local landfills.

Demolition of the existing building (10,659 square feet) would produce approximately 826 tons of demolition waste and recycling opportunities of raw materials, or approximately 41 tons of waste per day over the course of 1 month demolition. Construction of the 60,621 square feet of new floor area would generate approximately 121 tons of construction waste.[214] Core/shell construction is estimated to take approximately 14 months. Therefore, Project construction would generate approximately 0.43 tons per day of construction waste on average throughout the construction phase.[215] It is anticipated that the Project's demolition and construction debris (41 tpd, 0.43 tpd, and 25,000 cy of exported dirt, respectively) would be transported to the Sunshine Canyon Landfill in Sylmar.

A majority of the City's construction and demolition waste was sent to the Puente Hills Landfill.[216] The Puente Hills Landfill closed on October 31, 2013, when its permit expired. However, there are other County Sanitation Districts' facilities available for disposal and recycling, including the nearby Puente Hills Materials Recovery Facility (MRF) that shares the same entrance as the Landfill. The Puente Hills MRF accepts all kinds of waste for recycling and disposal, including commercial, construction/demolition, and residential wastes.[217] The Puente Hills MRF is permitted to accept 4,400 tons per day and 24,000 tons per week of municipal solid waste.[218] As of 2014, the Puente Hills Intermodal Facility provide a Materials Recovery Facility/Transfer Station for the Waste to Rails system to the Mesquite Regional Landfill in Imperial County.[219] The Mesquite Landfill can accept 20,000 tons per day, with an overall capacity of 600 million tons and a lifespan of 100 years.[220] The Mesquite Landfill

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214 *Based on 4.02 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: 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 A-2, page A-1).*

215 *14 months x 20 working days per month = 280 working days. 121 tons / 280 days = 0.43 tons per day.*

216 *City of Los Angeles, Fact Sheet: Solid Waste Facilities: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf*

217 *County Sanitation Districts, Puente Hills Landfill Closing on October 31, 2013: http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1, accessed August 27, 2015.*

218 *County Sanitation Districts, Puente Hills MRF Fact Sheet: http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1, accessed August 27, 2015.*

219 *Puente Hills Landfill: http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=3708, August 27, 2015.*

220 *Mesquite Regional Landfill: http://www.mrlf.org/index.php?pid=5, August 27, 2015.*

would have adequate capacity to accept the Project's demolition and construction waste. Compliance with AB 939 would require a minimum of 50 percent of demolition and construction debris to be recycled. Therefore, short-term construction impacts to landfills and solid waste services will be less than significant.

Operation

As shown on Table 3.17-3, Project Estimated Solid Waste Generation, it is estimated the Project would generate a net total of approximately 719 pound per day (or 0.36 tons per day) of solid waste. This is a net total because the gross total was reduced by the solid waste of the existing onsite commercial use.

Table 3.17-3
Project Estimated Solid Waste

Land Use	Size	Solid Waste Generation Rates	Total (pounds)
Existing (to be removed)			
Office	10,659 sf	6 pounds / 1,000 sf	(64)
		Existing	**(64)**
Project			
Hotel	175 rooms	4 pounds / room	700
Gym	542 sf	3.12 pounds / 100 sf	17
Restaurant	5,043 sf	6 pounds / 1,000 sf	30
Retail	600 sf	6 pounds / 1,000 sf	36
		Proposed	**783**
		Total Increase (Proposed – Existing)	**719**

Note: sf = square feet
Rates: CalRecycle Estimated Solid Waste Generation Rates: http://www.calrecycle.ca.gov/wastechar/wastegenrates/
Office: 6 pounds/1,000 sf.
Hotel: 4 pounds/room. Lobby solid waste generation is expected to be minimal due to the areas not being very large congregation spaces or providing goods that would be disposed of.
Restaurant: 5 pounds/1,000 sf.
Retail: 5 pounds/1,000 sf
Table: CAJA Environmental Services, October 2015.

The Sunshine Canyon Landfill can accept 12,100 tpd (and currently accepts 9,000 tpd on weekdays and 3,000 tpd on Saturday), and could therefore accommodate the additional approximately 0.36 tons per day increase in solid waste resulting from the Project. After Sunshine Canyon closes, the Puente Hills MRF and Mesquite Canyon Landfills would have adequate capacity for Projection operation 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.

The City had an accelerated goal of 75 percent solid waste diversion by 2013. During fiscal 2012-13, the City exceeded the mandated 75 percent diversion rate goal, achieving 76.4 percent,[221] with the goal to achieve a 90 percent diversion by 2025.[222] The regulatory compliance measure listed below would ensure that solid waste is separated and disposed/recycled properly during operation further mitigating any potential solid waste impact from Project operations. Therefore, the impact associated with solid waste during operation of the Project would be less than significant.

Regulatory Compliance Measures

Designated Recycling Area

In compliance with Los Angeles Municipal Code, the proposed Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

Construction Waste Recycling

In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which will total 70 percent by 2013, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the Los Angeles Municipal Code, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

Commercial/Multifamily Mandatory Recycling

In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program.

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[221] *City of Los Angeles, Department of Public Works, Year at a Glance, 2012-13: http://www.lacitysan.org/general_info/pdfs/BOS_YAAG_2012.pdf, August 27, 2015.*

[222] *City of Los Angeles, Department of Public Works, A Five-Year Strategic Plan, Fiscal Years 2013/14-2017/18: http://www.lacitysan.org/general_info/pdfs/Strategic_Plan2013-14.pdf, August 27, 2015.*

The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB341.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated on-site by the Project will be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Integrated Resources Plan, which is the long-range solid waste management policy plan for the City through 2025, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills.

The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction, and the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials. Waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Sunshine Canyon Landfill has adequate capacity and is slated to close in 2037. The Waste-By-Rails program to the Mesquite Landfill would have adequate capacity and is slated to operate for 100 years. The Project would comply with federal, state, and local regulations, and as such, impacts would be less than significant.

ENERGY ANALYSIS

Los Angeles Department of Water and Power

Electricity

The LADWP supplies more than 26 million megawatt hours (mw-h) of electricity a year for the City of Los Angeles' 1.4 million customers.[223] The utility was established more than 100 years ago to provide water and electric needs to the City's businesses and residents. LADWP serves a 465-square-mile area and is the largest municipal utility in the nation. In total, LADWP operates 20 receiving stations and 174 distribution stations to provide electricity to LADWP customers, with additional facilities to be acquired as their load increases. The power supply sources include: 39 percent from coal, 22 percent from natural gas, 3 percent from large hydroelectric, 11 percent from nuclear, 5 percent from unspecified sources, and 20 percent from renewables which include small hydroelectric, solar, wind, geothermal, biomass, and waste.[224] Under the City Charter, LADWP has an obligation to serve the citizens of the City.[225]

Table 3.17-4, LADWP Electricity Capacity, shows the LADWP electricity system capacity and Table 3.17-5, LADWP Energy Usage, shows the LADWP power usage. Table 3.17-6, Energy Sales and Peak Demand, provides the estimated sales (consumption) by sector (residential, commercial, industrial, etc.) and peak demand over the next 10 years.

Table 3.17-4
LADWP Electricity Capacity

	Amount (megawatts)
Net Maximum Plant Capacity	7,300
Los Angeles Peak Demand	6,177

Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afrLoop=1119458526572567
Table: CAJA Environmental Services, December 2015.

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223 *LADWP, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=na2o8wvza_4&_afrLoop=81976737428000.*

224 *LADWP, Power Facts and Figures website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=scgxlug8o_21&_afrLoop=82063279159000&_afrWindowMode=0&_afrWindowId=na2o8wvza_1#%40%3F_afrWindowId%3Dna2o8wvza_1%26_afrLoop%3D82063279159000%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dna2o8wvza_33.*

225 *LADWP Reliability Study, December 31, 2010, pg. i: http://www.swrcb.ca.gov/water_issues/programs/ocean/cwa316/saccwis/docs/sa_ladwp_2011reliability.pdf*

Table 3.17-5
LADWP Energy Usage

	Amount (megawatt-hours)
Residential	8.4
Commercial	12.8
Industrial	1.9
Other	0.4
Total	23.14

Fiscal Year 2013. Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afrLoop=1119458526572567.
Table: CAJA Environmental Services, December 2015.

Table 3.17-6
Energy Sales and Peak Demand

Year	Sector Sales (gw-h)						Peak Demand (mw)
	Residential	Commercial	Industrial	Misc.	PHEV	Total	
2015-16	7,931	12,837	1,928	442	19	23,157	5,625
2016-17	7,793	12,757	1,900	441	31	22,922	5,579
2017-18	7,714	12,707	1,904	440	58	22,823	5,542
2018-19	7,731	12,633	1,909	439	94	22,807	5,534
2019-20	7,738	12,528	1,912	439	148	22,765	5,532
2020-21	7,766	12,552	1,913	438	220	22,888	5.532
2021-22	7,825	12,649	1,914	437	325	23,150	5,603
2022-23	7,884	12,712	1,913	436	399	23,344	5,658
2023-24	7,951	12,804	1,911	436	413	23,515	5,698
2024-25	8,020	12,927	1,910	435	426	23,718	5,747

gw-h – gigawatt-hours; mw – megawatts
Misc. includes streetlighting, Owens Valley, and intra-departmental
LADWP, 2014 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=q463ohn9x_17&_afrLoop=1251830725757441, April 14, 2015.
Table: CAJA Environmental Services December 2015.

Power and Energy

When discussing electricity, the unit of measurement depends on if it is referring to power or energy. Power is the rate at which energy is consumed (in watts, kilowatts, or megawatts). Energy is the amount

of power consumed (in watt-hours). Customers are charged based on their energy use (typically kilowatt-hours). The relationship between power and energy:

- Energy (watt-hours) = power (watts) X time (hours)

For example, a 60-watt light bulb refers to the amount of power the light consumes. If the 60-watt light bulb was on for 12 hours, it would consume 720 watt-hours (or 0.72 kilowatt-hours) of energy.

Load Factor

Load factor represents how constant energy usage is over a given day. A 100 percent load factor means that the same amount of power is used off peak as on peak, so the system is getting full use of its generating resources. A low load factor results in generators being started more often to serve load for a few hours a day, which is not optimum. From the 1990s through 2005, annual system load factors were trending slowly upward, which is a positive movement. Since 2006, system load factors are trending down. Some of this decline in load factor is due to the fact that much of the historic energy efficiency effort is directed at lighting, which has a higher impact on sales when compared to peak. In the forecast for the future, this downward trend is sustained.[226]

Load factor can be expressed as the ratio of the average load in kilowatts (kw) supplied at a designated period compared to the peak or maximum load in kilowatts occurring in the period. Load factor, in percent, is derived by multiplying the kilowatt-hours (kw-h) in the period by 100 and dividing by the product of the maximum demand in kilowatts and the number of hours in the period:[227]

- Load Factor (%) = (kw-h / hours / kw) X 100%

Example: Assume a 30-day billing period or 30 days X 24 hours for a total of 720 hours. Assume a customer used 10,000 kw-h and had a maximum demand of 21 kw. The customer's load factor would be 66 percent [(10,000 kw-h / 720 hours / 21 kw)*100].

Southern California Gas Company

Natural Gas

Southern California Gas Company (SCG), a subsidiary of Sempra Energy and the nation's largest natural gas supplier, distributes natural gas to 19.5 million residential, commercial, and industrial customers throughout the southern half of California. SCG owns and operates 95,000 miles of gas distribution

[226] *LADWP, 2014 IRP, pg 47: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=q463ohn9x_17&_afrLoop=1251830725757441.*

[227] *Madison Gas and Electric, Glossary for Load Factor: http://www.mge.com/about/electric/glossary.htm#f.*

mains and service lines, as well as nearly 3,000 miles of transmission and storage pipeline. The utility also owns gas transmission compressor stations and underground storage facilities. The total 136.1 billion cubic feet (Bcf) of natural gas storage capacity is divided as follows: 82 Bcf is for core customers, small industrial, and commercial customers; 4 Bcf is for system balancing; and the remaining 49.1 Bcf is available to other customers.[228] Natural gas service is provided in accordance with SCG's policies and extension rules on file with the California Public Utilities Commission (PUC) at the time contractual agreements are made.

The State produces about 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the State, 62 percent from the Southwest and Rocky Mountain area, and 23 percent from Canada. In the last ten years, three new interstate gas pipelines were built to serve California, expanding the over one million miles of existing pipelines. However, the availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SCG is under the jurisdiction of the PUC, but can be affected by the actions of federal regulatory agencies. Should these agencies take any action affecting natural gas supply or the conditions under which service is available, natural gas service would be provided in accordance with those revised conditions.

The 2014 California Gas Report has projections regarding future demand for natural gas in the Southern California region. SCG projects total gas demand to decline at an annual rate of 0.33% from 2013 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). From 2014 to 2035, residential demand is expected to decline from 247 Bcf to 223 Bcf. The decline is due to declining use per meter offsetting new meter growth. The core, non-residential markets are expected to grow from 118 Bcf in 2014 to 122 Bcf by 2035. The change reflects an annual growth rate of 0.15% over the forecast period. The noncore, non-EG markets are expected to decline from 169 Bcf in 2013 to 150 Bcf by 2035. The annual rate of decline is approximately 0.5% due to very aggressive energy efficiency goals and associated programs. On the other hand, utility gas demand for EOR steaming operations, which had declined since the FERC-regulated Kern/Mojave interstate pipeline began offering direct service to California customers in 1992, has shown some growth in recent years because of continuing high oil prices and is expected to show further growth in the early years of the forecast period. EOR demand is forecast to level off in 2016 and remain relatively flat through 2035 as gains are offset by the depletion of older oil fields.[229]

Supply

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[228] *2014 California Gas Report, pg 37: http://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf.*

[229] *2014 California Gas Report: http://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf.*

Under average temperature conditions and normal hydro year, gas demand for California averaged 6,173 million cubic feet per day (cf/day) in 2014, projected to decrease to 5,910 million cf/day by 2035, a decline of -0.2 percent per year.[230] Table 3.17-7 Statewide Total Supplies and Requirements, shows the statewide total supplies and requirements for natural gas for 2014 to 2030. In 2014 (the latest data available from the 2014 California Gas Report), SCG's highest winter sendout was 4,881 million cf/day and highest summer sendout was 3,393 million cf/day.[231]

Table 3.17-7
Statewide Total Supplies and Requirements

	2014	2018	2020	2025	2030
Utility Supply Source					
California Sources	392	392	394	394	394
Out-of-State	4,960	4,853	4,832	4,859	4,845
Non-Utility Served Load	1,090	1,018	961	938	938
Statewide Supply Source Total	**6,442**	**6,263**	**6,187**	**6,191**	**6,177**
Utility Requirements					
Residential	1,218	1,201	1,186	1,166	1,160
Commercial	505	505	499	488	486
Natural Gas Vehicles	43	52	56	64	70
Industrial	934	942	931	908	895
Electric Generation	2,026	1,906	1,913	1,979	1,975
Enhanced Oil Recovery Steaming	44	52	52	52	52
Wholesale/International Exchange	235	240	241	247	253
Company Use and Unaccounted-For	80	79	79	80	79
Non-Utility Served Load	1,090	1,018	961	938	938
Statewide Requirements Total	**6,175**	**5,995**	**5,918**	**5,921**	**5,908**

All measurements in million cf per day
Average temperature and normal hydro year.
Source: 2014 California Gas Report, pg 15:
http://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf
Table: CAJA Environmental Services December 2015.

[230] *2014 California Gas Report, page 5: http://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf.*

[231] *2014 California Gas Report, pg. 31: : http://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf*

Demand

The SCG demands for 2013 and 2035 are shown in Table 3.17-8. Demand is expected to be relatively flat (commercial) or exhibit annual declines (residential, industrial) due to modest economic growth, PUC-mandated demand-side management (DSM) goals and renewable electricity goals, decline in commercial and industrial demand, and continued increased use of non-utility pipeline systems by Enhanced Oil Recovery (EOR) customers and savings linked to advanced metering modules.[232]

Table 3.17-8
SCG Natural Gas Demands

	2013	2035	Difference
Residential	251	223	-28
Core Commercial	83	84	+1
Non-Core Commercial	17.7	8.6	-9.1
Industrial	22.9	15	-7.9

All measurements in billion cf
Source: 2014 California Gas Report, pgs. 64-66:
http://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf
Table: CAJA Environmental Services December 2015.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

State CEQA Guidelines

Appendix F, Energy Conservation, of the *CEQA Guidelines* directs an EIR to include the following:

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

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

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

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

[232] *22014 California Gas Report, pg. 64: http://www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf*

(e) The effects of the project on energy resources; and

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

City of Los Angeles CEQA Thresholds Guide

As set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

(a) The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;

(b) Whether and when the needed infrastructure was anticipated by adopted plans; and

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

Based on these factors a project would have a significant impact if:

- The project would result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities; or
- The design of the project fails to incorporate energy conservation measures that go beyond existing requirements.

Methodology

The South Coast Air Quality Management District (SCAQMD) has electricity[233] and natural gas[234] consumption rates for various land uses based on the square footage of development. Applying the SCAQMD rates to the proposed building square footages and use types, an estimate was made as to the future demand for the Project. Given the existing capacity of the Project Site's electrical and natural gas delivery system and future projected consumption and demand, an assessment was made of the Project's impacts. Appendix F of the State *CEQA Guidelines* further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives. In accordance with Appendix F of the State *CEQA Guidelines,* this includes relevant information and analyses that address the energy implications of the Project. This section represents a summary of the Project's anticipated energy needs, impacts, and conservation measures.

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[233] *SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-11-A, Electricity Usage Rate.*

[234] *SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate.*

Project Impacts

Construction

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). These tools and lighting would be powered with charging stations supplied by portable generators. There would be no use of any permanent infrastructure for the delivery of electricity until after construction of the buildings. The electrical demand generated by these tools[235] and lighting[236] is substantially less than the operational demand. Electrical consumption of small power construction tools range from 300 to 6,000 watts during run time (0.3 kw to 6 kw). A typical temporary construction lighting tower would have 4 x 1,000 watt fixtures (4 kw). If running for 8 hours per evening/night, the usage would be 32 kw-h. Electricity, when needed, would be supplied by the local utility provider (LADWP) via existing on-site connections. This would be consistent with suggested measures in the *L.A. CEQA Thresholds Guide* to reduce air pollution by using electricity from power poles, rather than temporary diesel or gasoline powered generators. A temporary water supply, primarily for fugitive dust suppression and street sweeping, would also be supplied the LADWP. Electricity used to provide temporary power for lighting and electronic equipment (e.g., computers, etc.) inside temporary construction trailers and for lighting when necessary for general construction and renovation activity would generally not result in a net increase in on-site electricity use over existing conditions since the Site is occupied. Therefore, electricity impacts during construction would be less than significant.

Demolition, site preparation and excavation, and grading, excavation would last for approximately 5.5 months. Heavy-duty construction equipment associated with these activities would include diesel-fueled haul trucks, excavators, skid steer loaders, tractors, and water trucks. Heavy-duty construction equipment associated with building construction would include air compressors, concrete pumps, forklifts, lifts, and welders. Heavy-duty construction equipment associated with outdoor hardscape and landscaping would include air compressors, backhoes, dozers, forklifts, lifts, loaders, and rollers. The majority of the equipment will likely be diesel-fueled; however, smaller equipment, such as air compressors and lifts may be electric-, gas-, or natural gas-fueled. Construction equipment fuels (diesel, gas, or natural gas) would be provided by local or regional suppliers and vendors. The transportation fuel required by construction workers would depend on the total number of worker trips estimated for the duration of construction activity. A study by Caltrans found that the statewide average fuel economy for all vehicle types

[235] *Website: http://www.uspowerco.com/articles/power_consumption_chart_for_tools*

[236] *Website: http://www.sunbeltrentals.com/equipment/category.aspx?id=19*

(automobiles, trucks, and motorcycles) is projected at 22.711 miles per gallon (mpg) and worse-case diesel trucks is 6.178 mpg in 2015.[237]

Assuming construction worker vehicles have an average fuel economy consistent with the Caltrans study and assuming the mpg for gasoline and diesel above, based on the maximum projected number of workers during each phase, the Project would use approximately 17,824 gallons of gasoline.[238] In 2012, California consumed a total of 337,666 thousand barrels of gasoline for transportation, which is equivalent to a total annual consumption of 14.1 billion gallons by the transportation sector.[239] Construction of the Project would use approximately 13,500 gallons of diesel, assuming heavy-duty construction equipment (such as haul route trucks) is primarily diesel-fueled. This would represent 0.0002 percent of the statewide gasoline consumption and 0.00001 percent of the statewide diesel consumption. The expected construction gasoline and diesel fuel gas for the Project would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors. Therefore, gas impacts during construction would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))[240] to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by

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237 *California Department of Transportation, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF.*

238 *Construction VMT derived from the client provided information, and air quality trips and VMT model sheets, included in the appendix to the MND. Worker, vender number x trip lengths x length of phase. Haul trips number x length of trip. VMT / mpg = gallons. Approx 404,816 miles by construction workers and venders and approximately 83,400 miles by haul trucks.*

239 *US EPA, State Energy Data System, Table F-3: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf.*

240 *California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles,*
http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.

requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated.

Operation

Electricity Demand

Electrical conduits, wiring and associated infrastructure would be conveyed to the Project from existing LADWP lines in the surrounding streets to the Project during construction. The Project would likely require transformer vaults, which are common for buildings of its size. However, the construction of these vaults is part of the overall building construction and would not constitute unusual or unplanned infrastructure that would cause a significant impact on the environment. The analysis compares the electricity demand for the Project to the overall LADWP capacity Citywide for year 2018 (anticipated buildout). The LADWP forecasts that in 2017-2018, the total adjusted electricity sales (load forecast) will be 23,667 gigawatt-hours (gw-h) with residential uses consisting 7,714 gw-h and commercial uses consisting of 12.707 gw-h. The peak demand would be 5,542 megawatts (mw).[241]

As shown in Table 3.17-9, Project Estimated Electricity Demand, the Project would demand approximately 812,910 kw-h/year (0.812 gw-h/year) of electricity. This total was reduced by the demand of the existing uses, which would be removed.

Table 3.17-9
Project Estimated Electricity Demand

Land Use	Size	Electricity Rates	Total (kw-h/yr)
Existing (to be removed)			
Office	10,659 sf	12.95 kw-h / sf	138,034
		Existing	**(138,034)**
Project			
Hotel	175 rooms	9.95 kw-h / sf	696,500
Gym	542 sf	12.95 kw-h / sf	7,019

[241] *LADWP, 2014 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=9kjcyeafd_4&_afrLoop=1178238919540287.*

Table 3.17-9
Project Estimated Electricity Demand

Land Use	Size	Electricity Rates	Total (kw-h/yr)
Restaurant	5,043 sf	47.45 kw-h / sf	239,290
Retail	600 sf	13.55 kw-h/sf	8,135
		Proposed Subtotal	**950, 944**
		Total (Proposed – Existing)	**812,910**

sf =square feet; kw-h = kilowatt-hour; yr = year
Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate
The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
Hotel Rooms: average budget room is 300 to 400 square feet. http://www.dimensionsinfo.com/hotel-room-size/. This analysis assumes 400 square feet per room.
Table: CAJA Environmental Services, December 2015.

The Project's annual electricity consumption would represent approximately 0.003 percent of the forecasted electricity demand in 2018.[242] Thus, the Project is within the anticipated demand of the LADWP system. The LADWP is able to supply 7,300 mw of power with a current peak of 6,177 mw. Thus, there is 1,055 mw of additional power capacity. To put this into perspective, this represents approximately 0.002 percent of the additional power capacity at existing levels. Peak demand is expected to grow to 5,786 mw in 2018-2019 and 6,166 mw in 2023-2024.[243] Despite these growth projections, they would still not exceed the existing capacity of 7,300 mw. Thus, there is adequate supply capacity to serve the Project.

Therefore, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption. The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The 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.[244]F It should also be noted that the Project's

[242] *0.812 / 22,807 x 100% = 0.003%*

[243] *2014 Power Integrated Resource Plan, Table 2-3, Forecasted growth in Annual Peak Demand: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?_afrLoop=1185569764107656&_afrWindowMode=0&_afrWindowId=9kjcyeafd_1#%40%3F_afrWindowId%3D9kjcyeafd_1%26_afrLoop%3D1185569764107656%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1ahsnk3itw_4.*

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

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 Project would likely be lower than that forecasted. Based on the above analysis, no operational impacts associated with the consumption of electricity would occur.

Natural Gas Demand

As shown in Table 3.17-10, Project Estimated Natural Gas Demand, the Project is estimated to demand approximately a net decrease of 12,134 cf/month of natural gas. The total was reduced by the demand of the existing uses, which would be removed. The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the Project's energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2014 is estimated at 3,101 million cf/day and 2018 is estimated at 3,027 million cf/day. The Project's increase (not counting the existing use removal) of 18,777 cf/day represents approximately 0.0005 percent of the 2018 peak demand. Thus, there is adequate supply capacity and no impacts would occur. The following mains exist on streets surrounding the Project Site:[245]

- 3" diameter distribution main on De Longpre Avenue to serve the De Longpre portion of the Site
- 2" diameter main on Ivar Avenue to serve the Ivar portion of the Site.

The Project can be served from any of these mains. The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SCG undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements.[246] The Project would not result in the construction of natural gas facilities (i.e., natural gas distribution lines) that would cause significant environmental impacts. As such, no impacts on natural gas infrastructure as a result of the Project would occur.

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[245] *Correspondence from SCG , July 20, 2015*

[246] *Correspondence from SCG, July 20, 2015.*

Table 3.17-10
Project Estimated Natural Gas Demand

Land Use	Size	Natural Gas Rates	Total (cf/mo)
Existing (to be removed)			
Office	10,659 sf	2.9 cf/mo	30,911
		Existing	**(30,911)**
Project			
Hotel	175 rooms	4.8 cf/mo	840
Gym	542 sf	2.9 cf/mo	1,572
Restaurant	5,043 sf	2.9 cf/mo	14,625
Retail	600 sf	2.9 cf/mo	1,740
		Proposed Subtotal	**18,777**
		Total (Proposed – Existing)	**(12,134)**

sf =square feet; cf = cubic feet; mo = month
Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate
The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
Table: CAJA Environmental Services, December 2015.

Project design features for building efficiency would help alleviate natural gas demand. In 2015, the state anticipates a surplus difference of 179 million cf of gas between the supply and demand requirements. 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.

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 three sites, Project impacts related to natural gas would be less than significant.

Transportation Energy Consumption

The Project's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for

transportation needs. A number of Metro bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site. As such, the Project Site is located in proximity to numerous Metro bus routes, thereby providing access for employees, patrons, and residents of the Project Site. These services provide an alternative to driving individual vehicles both into the Project Site from the surrounding areas as well as for residents, guests, and visitors at the Project Site to travel to surrounding areas. The increases in land use diversity and mix of uses on the Project Sites would reduce vehicle trips and vehicle miles travelled by encouraging walking, bicycling, and other nonautomotive forms of transportation, which would result in corresponding reductions in energy demand. Regarding bicycling, the Project would provide bicycle parking spaces at least to the City's Bicycle Parking Ordinance.

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 Project's estimated VMT of approximately 3.881 million miles per year[247], and assuming the Project's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 22.711 mpgs[248], approximately 170,900 gallons of fuel would be required in a year. This would represent less than 0.00001 percent of the statewide gasoline consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Sites would reduce the Project's consumption of gasoline and diesel. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

Alternative Energy Discussion

The use of energy provided by alternative (i.e., renewable) resources, off-site and on-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by LADPW, the service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation. LADWP is required to commit to the use of renewable energy sources for compliance with the California Renewable Energy Resources Act, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 MW or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived

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[247] *Operational VMT derived from the Air quality trips and VMT model sheets, included in appendix to the MND.*

[248] *California Department of Transportation, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7,* http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF.

biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and "other renewables that may be defined later".[249]

LADWP's target procurement of energy from renewable resources in 2014 is 20 percent. As of 2011, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet Project demand. With respect to on-site renewable energy sources, because of the Project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy, the use of heat naturally present in shallow soil or in groundwater or rock to provide building heating/cooling and to heat water, requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air to a building. Although methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form (i.e., a form that could be used without further treatment), and its extraction and treatment for energy purposes would result in secondary impacts; it is currently regulated as a hazardous material by the City through its Methane Code.

The City's Green Building Code discusses renewable energy (Section 99.04.211):

99.04.211.4. Solar Ready Buildings [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid after the effective date of the 2013 California Energy Code (Title 24, Part 6) shall comply with the following:

1. All one- and two-family dwellings, shall comply with Section 110.10(b)1A, 110.10(b)2, 110.10(b)3, 110.10(b)4, 110.10(c), 110.10(d) and 110.10(e) of the California Energy Code (Title 24, Part 6).

2. All buildings, other than one- and two-family dwellings, shall comply with Section 110.10(b) through 110.10(d) of the California Energy Code (Title 24, Part 6).

99.04.211.5. Space for Future Electrical Solar System Installation [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid prior to the effective date of the 2013 California Energy Code (Title 24, Part 6), shall provide a minimum of 250 square feet of contiguous unobstructed roof area for the installation of future solar photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Finally, solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant. Wind-powered energy is not

[249] *City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.*

viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin. The California Energy Commission (CEC) studied the State's high wind resource potential.[250] Based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County. Additionally, there are no viable sites within the Project Site for placement and operation of a wind turbine. The CEC has identified areas within the State with high potential for viable solar, wind, and geothermal energy production. The CEC rated California's solar potential by county using insolation values available to typical photovoltaic system configurations, as provided by the National Renewable Energy Laboratory. Although Los Angeles as a County has a relatively high photovoltaic potential of 3,912,346 megawatt-hours (MWh)/day, inland counties such as Inyo (10,047,177 MWh/day), Riverside (7,811,694 MWh/day), and San Bernardino (25,338,276 MWh/day) are more suitable for large-scale solar power generation.[251] In addition, most of the high potential areas of greater than 6 KWh/sqm/day in Los Angeles County are concentrated in the northeastern corner of the county around Lancaster, approximately 45 miles away from the Project Site.

Regulatory Compliance Measures

The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use.

The Project shall comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria.

The Project shall comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

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250 *California Energy Commission. California Wind Resource Potential, http://www.energy.ca.gov/maps/renewable/Wind_Potential.pdf.*

251 *California Energy Commission, California Solar Resources, April 2005, http://www.energy.ca.gov/2005publications/CEC-500-2005-072/CEC-500-2005-072-D.PDF.*

18. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to 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, 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?

Less Than Significant Impact. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues. The Project Site is located in an urbanized area of the City. There are no street trees on the City sidewalk around the Site. There is no ornamental plants or sidewalk grass strips around the Site. The Project would have no impact to historic resources. The Project will have a less than significant impact on archeological resources, paleontological resources, and human remains, with implementation of required regulatory compliance measures. The Project will not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the Project will be less than significant.

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 viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The Project will not combine with related projects to create a cumulatively significant impact in any of the environmental issue areas analyzed in the Draft IS/MND.

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. An adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

All the related projects are in the City of Los Angeles, except for Nos. 79-85, which are in the City of West Hollywood. The related projects include a variety of land uses, including approximately:

- 8,216 residential units (apartments, condominiums, student and faculty/staff housing, live/work)
- 104,992 square feet of health club
- 3,781,596 square feet of office (various types)
- 179 students facilities
- 997,068 square feet of retail
- 1,731 hotel rooms
- 124,737 square feet of restaurant
- 25,894 square feet of bar/lounge, special event and banquet space
- 24,900 square feet of storage, studio sound stage, and stage support space

The nearest related projects to the Project Site are:

- No. 68 – 1311 Cahuenga, a project with apartments and commercial uses.
- No. 69 –1341 Vine Street, a hotel and office project.
- No. 74 – 1310 Cole, an apartment and office project
- No. 76 – 6322 De Longpre, a project with office, apartment, retail and restaurant uses.

No. 68 is approximately 550 feet south of the Site. No. 74 is approximately 575 feet south of the Site. These distances are further than several of the identified sensitive receptors. No. 76 is the Buzzfeed Studios campus that is already identified as a sensitive receptor for the analysis of this MND. No. 69 is further away and beyond Buzzfeed Studios. With mitigation measures, and the distance between the sites, impacts of the Project would not be cumulatively considerable and cumulative impacts would be less than significant.

Each of these related projects that require discretionary actions would be subject to their own CEQA analysis (MND or EIR) to evaluate potential impacts and provide mitigation measures where appropriate. The other related projects have several intervening buildings and major roadways/freeway in between, and are at least 4 blocks away or more, which will ensure that any other impacts of the related project would not combine with the Project.

Aesthetics

Development of the Project in conjunction with the related projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With respect to aesthetics and views, and shade and shadow impacts, none of the related projects are located in proximity to the Project Site such that their development would affect the aesthetic character of the site or its immediate surroundings. There are no scenic or protected views in the area, and the view corridor along Cahuenga is not unique or provides a distinct vantage point. Development of related projects is expected to occur in accordance with adopted plans and regulations. Therefore, cumulative aesthetic impacts would be less than significant and the Project would not make a cumulative considerable contribution to this less than significant impact.

Agriculture and Forestry Resources

Development of the Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

Air Quality

AQMP Consistency

Cumulative development can affect implementation of the 2012 AQMP. The 2012 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2012 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. The Project would contain a hotel and retail use. As such, the Project could not conflict with the growth assumptions in the regional air quality attainment plan and will be accommodated in the region's emissions inventory for the RTP/SCS and AQMP.

As discussed in the Air Quality and Utilities and Service Systems sections of this IS/MND, the Project is consistent with SCAG's growth projections which are based on macroeconomic data and socioeconomic variables independent of parcel-level land use designation and zoning. Therefore, the Project would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2012 AQMP would be less than significant.

Construction and Operational Emissions

Cumulative air quality impacts from construction and operation of the Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Thus, as discussed in Question 3(c) above, because the construction-related and operational daily emissions associated with Project would not exceed the SCAQMD's recommended thresholds (with mitigation), these emissions associated with the Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

Odor Impacts

With respect to odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the related projects and the Project's long-term operations phase. Thus, the Project would not make a cumulative considerable contribution to odor impacts and cumulative odor impacts would be less than significant.

Biological Resources

The Project would have no impact upon biological resources. Development of the Project would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance. Thus, cumulative impacts to biological resources would be considered less than significant.

Cultural Resources

Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Project's impacts to cultural resources concluded that the Project would have no significant impacts with respect to cultural resources following appropriate mitigation for archaeology, paleontology, and human remains. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

Geology and Soils

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any of the related projects. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of the mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

Greenhouse Gas Emissions

The Project emissions represent a 32 percent reduction in CO_2e emissions from a Business-As-Usual scenario and are consistent with the State's AB 32 Scoping Plan objectives for reducing community-based emissions. The Project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

Hazards and Hazardous Materials

Hazards are site-specific and there is little, if any, cumulative hazardous relationship between the Project and any of the related projects. Similar to the Project, potential impacts related to hazards would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's hazards and hazardous materials impact concluded that, through the implementation of the mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative hazard and hazardous materials impacts would be less than significant.

Hydrology and Water Quality

The Project Site and the surrounding areas are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site and the related projects, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the Low Impact Development Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulatively considerable contribution to

impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

Land Use

None of the related projects would physically divide an established community or conflict with a habitat conservation plan because they are all in urban areas. There are no City or County significant ecological areas in the related projects.[252] Therefore, cumulative land use impacts would be less than significant.

Furthermore, the Project would not make a cumulatively considerable contribution to a cumulatively significant land use inconsistency, and cumulative impacts would be less than significant. As reflected in Table 3.16-8, there are 85 related projects in the Project Site vicinity. The related projects are generally located in commercial or residential land use designations and zones, and thus do not implicate industrial policies as articulated in the Framework Element, Hollywood Community Plan or Industrial Land Use Policy. Finally, the City's threshold of significance analyzes inconsistency only with respect to policies adopted to mitigate or avoid environmental impacts. The City of West Hollywood related projects would be subject to the land use policies of that jurisdiction. Thus, a cumulative inconsistency cannot result in a finding of significance.

Mineral Resources

Development of the Project in combination with the related projects would not result in the loss of availability of mineral resources. The Project Site and the surrounding area are highly urbanized area and do not include any MRZ zones. Therefore, no cumulative impact would occur.

Noise

The related projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. Construction-period noise for the Project and each related project (that has not yet been built) would be localized in nature. None of the related projects are in close enough proximity to the Project Site to cause cumulative construction or stationary noise or vibration impacts. Any construction noise from related projects, were it to occur concurrently with the Project, would be attenuated by the distance across Cahuenga Boulevard. 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. With respect to cumulative traffic noise impacts, it should be noted that the Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Project Traffic Impact Study. Based on the Project's estimated trip generation, the Project plus future cumulative baseline conditions would

[252] *Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/index01.cfm*

not have the potential to create a significant cumulative impact. As such, the Project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with construction noise would be less than significant.

Population and Housing

The related projects would introduce additional residential, commercial/retail/restaurant, office, school, and other related uses to the City of Los Angeles and City of West Hollywood. Any residential related projects would result in direct population growth. The related projects that involve residential developments would cumulatively contribute approximately 8,216 residential dwelling units to the area, generating approximately 23,087 new residents (a conservative assumption). The Project would not have any residential units or add any population. The net increase of approximately 80 employees is not cumulatively considerable as there are no thresholds for employee impacts. The Project would not displace any residents. The City is expected to increase its direct population by approximately 166,403 persons from 2012-2020 according to SCAG. This would ensure that the land uses changes (including density increases) will be accommodated in the region's inventory for the RTP/SCS. The Project and related projects would not exceed this projection. The Project would not make a cumulative considerable contribution and cumulative impacts to population and housing would be less than significant.

Public Services

Fire

The related projects in West Hollywood would be served by the Los Angeles County Fire Department, through Station No. 7 and No. 8. 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, each of the related projects in the City of Los Angeles would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the development on any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. The LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to fire protection services impacts, and, as such cumulative impacts on fire protection would be less than significant.

Police

The related projects in West Hollywood would be served by the Los Angeles County Sheriff's Department, through the West Hollywood Station. 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. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. The LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to police protection services impacts, and cumulative impacts on police protection would be less than significant.

Schools

The Project, in combination with the related projects is expected to result in a cumulative increase in the demand for school services. Development of the related projects is projected to generate approximately 7,819 new residential dwelling units to the area, which will generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Project. In addition, three of the related projects involve the development of facilities for 179 students (daycare, kindergarten, tutoring, and school). However, each of the new housing units, commercial, and industrial uses would be responsible for paying mandatory school fees to mitigate the increased demands for school services. T he Project would not make a cumulative considerable contribution and cumulative impacts on schools would be less than significant.

Parks and Recreation

Development of the Project in conjunction with the related projects could 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, which is currently below the preferred standard. However, each of the residential related projects is required to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Each residential related project would also be required to comply with the on-site open space requirements of

the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities and cumulative impacts would be less than significant.

Library

The related projects in West Hollywood would be served by the Los Angeles County Public Library, through the West Hollywood Branch. Development of the related projects would likely generate additional demands upon library services. However, there are no planned expansions or new libraries by the LAPL (as cited by the LAPL response letter, included in the appendices) that would be considered a significant impact. Therefore, the cumulative impacts related to library facilities would be less than significant.

Traffic

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 baseline w/Project scenario). This cumulative future includes the related projects. The future (2018) with Project analysis shows no significant impact to any of the study intersections or CMP intersections or freeways. This is directly analyzed in the traffic section above. Therefore, the Project's cumulative impact is considered less than significant.

Utilities

Development of the Project, in conjunction with cumulative growth throughout the City of Los Angeles (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.

Wastewater

As shown on Table 3.18-1, Cumulative Estimated Wastewater Generation, it is estimated the Related Projects will generate a net total of approximately 2,092,460 gallons per day (gpd) (or 2.1 mgd) of wastewater. The Project represents 1.0 percent of the cumulative total. The HTP has adequate capacity (88 mgd) to accommodate the Cumulative total. The Project would not make a cumulative considerable contribution and a less than significant cumulative impact would occur.

Table 3.18-1
Cumulative Estimated Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gdp)
Residential	8,216 units	150 gallons / unit	1,232,400
Health Club	104,992 sf	650 gallons / 1,000 sf	68,245
Office	3,781,596 sf	120 gallons / 1,000 sf	453,792
School	179 students	11 gallons / student	1,969
Retail	997,068 sf	50 gallons / 1,000 sf	49,853
Hotel	1,731 rooms	120 gallons / room	207,720
Restaurant	124,737 sf	300 gallons / 1,000 sf	37,421
Bar/Lounge	25,894 sf	720 gallons / 1,000 sf	18,644
Storage	24,900 sf	30 gallons /1,000 sf	747
		Related Projects	**2,070,791**
		Proposed Project	**21,669**
		Cumulative (Related + Project)	**2,092,460**

Note: sf = square feet; gpd = gallons per day
Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf
Residential units include a variety of types and unknown number of bedrooms. This analysis assumes an average of two-bedroom units, which will balance the studio and 1-bedroom units with larger units.
Since some of the related projects do not contain enough details to determine specific types within a given land use category, the rates selected here include the largest generator to show a most conservative impact.
Retail includes two rates (one for less than 100,000 sf and one for greater than 100,000 sf). This analysis includes the larger rate for a greater generator to show a most conservative impact.
Table: CAJA Environmental Services, March 2016.

Water

As shown on Table 3.18-2, Cumulative Estimated Water Demand, it is estimated the related projects and the Project will demand a net total of approximately 2,555,125 gallons per day (gpd) (or 2.56 mgd) of water. The Project represents 1.0 percent of the cumulative total. The 2010 Urban Water Management Plan projects a supply of 614,800 AFY in 2015 and 652,000 AFY in 2020.[253] The cumulative total is

[253] *2010 Urban Water Management Plan, Los Angeles, pg. 20: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water;jsessionid=b6mMVfCZsTJlyDLQTNnk1Hhr2VQSHFp16ZTTGtNR4R49B8sSS66y!1973388915?_afrLoop=5965741187878 94&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D5965741187878894%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dvzv72rq95_4, August 27, 2015.*

approximately 2.760 AFY, which is within the supply of the UWMP and accommodated by any project that conforms to the General Plan and zoning. Related projects that do not would be required to demonstrate that there is adequate supply, through a Water Supply Assessment for example. The LAAFP has adequate capacity (between 50 and 150 mgd, during summer and non-summer months, respectively) to accommodate the Cumulative total. The Project would not make a cumulative considerable contribution and a less than significant cumulative impact would occur.

Table 3.18-2
Cumulative Estimated Water Demand

Land Use	Size	Water Demand Rates	Total (gdp)
Residential	8,216 units	177 gallons / unit	1,454,232
Health Club	104,992 sf	832 gallons / 1,000 sf	87,353
Office	3,781,596 sf	153.6 gallons / 1,000 sf	580,854
School	179 students	14 gallons / student	2,506
Retail	997,068 sf	64 gallons / 1,000 sf	63,812
Hotel	1,731 rooms	153.6 gallons / room	265,882
Restaurant	124,737 sf	384 gallons / 1,000 sf	47,899
Bar/Lounge	25,894 sf	922 gallons / 1,000 sf	23,874
Storage	24,900 sf	38 gallons /1,000 sf	946
		Related Projects	**2,527,358**
		Proposed Project	**27,767**
		Cumulative (Related + Project)	**2,555,125**

Note: sf = square feet; gpd = gallons per day
Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.
Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf
Residential units include a variety of types and unknown number of bedrooms. This analysis assumes an average of two-bedroom units, which will balance the studio and 1-bedroom units with larger units.
Since some of the related projects do not contain enough details to determine specific types within a given land use category, the rates selected here include the largest generator to show a most conservative impact.
Retail includes two rates (one for less than 100,000 sf and one for greater than 100,000 sf). This analysis includes the larger rate for a greater generator to show a most conservative impact.
Table: CAJA Environmental Services, March 2016.

Solid Waste

As shown on Table 3.18-3, Cumulative Estimated Solid Waste Generation, it is estimated the related projects and the Project will generate a net total of approximately 140,044 pounds per day of solid waste

(or 70 tons). The Project represents approximately 0.5 percent of the cumulative total. The Sunshine Canyon landfill has adequate capacity (and currently accepts 9,000 tpd on weekdays and 3,000 tpd on Saturday) to accommodate the Cumulative total. The Project would not make a cumulative considerable contribution and a less than significant cumulative impact would occur

Table 3.18-3
Cumulative Estimated Solid Waste Generation

Land Use	Size	Solid Waste Rates	Total (pounds)
Residential	8,216 units	12.23 pounds / unit	100,482
Health Club	104,992 sf	31.2 pounds / 1,000 sf	3,276
Office	3,781,596 sf	6 pounds / 1,000 sf	22,690
School	179 students	0.5 pounds / student	90
Retail	997,068 sf	5 pounds / 1,000 sf	4,985
Hotel	1,731 rooms	4 pounds / room	6,924
Restaurant	124,737 sf	5 pounds / 1,000 sf	624
Bar/Lounge	25,894 sf	5 pounds / 1,000 sf	129
Storage	24,900 sf	5 pounds / 1,000 sf	125
		Related Projects	**139,325**
		Proposed Project	**719**
		Cumulative (Related + Project)	**140,044**

Note: sf = square feet
Rates: CalRecycle Estimated Solid Waste Generation Rates: http://www.calrecycle.ca.gov/wastechar/wastegenrates/
Table: CAJA Environmental Services, March 2016.

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2010 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2035. Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant with implementation of provided mitigation measures (where applicable). These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the related projects in the City. In addition, several of the related projects would be subject to SB 610, which requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand. Ultimately, the wastewater and water facilities (HTP and LAAFP) and the Puente Hills MRF, Sunshine Canyon landfill, and Mesquite landfill have adequate capacity to accommodate the project and related projects. 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.

Electricity

The related projects are served by LADWP, same as the Project Site, and thus are counted as part of cumulative analysis. Given that the Project includes 175 rooms and the related projects include 1,731 hotel rooms, the Project's contribution to the cumulative electrical demand would not be cumulatively considerable or significant, representing less than 10 percent of the total amount of increase. As shown in Table 3.18-4, Cumulative Estimated Electricity Demand, the cumulative projects would demand approximately 125,205,508 kw-h/year (125.2 gw-h/year) of electricity. The cumulative projects' annual electricity consumption would represent approximately 0.55 percent of the forecasted electricity demand in 2018.[254] Thus, there is adequate supply capacity to serve the cumulative projects. Thus, the cumulative projects are within the anticipated demand of the LADWP system. In other words, there is adequate energy capacity to service the Project and the related projects. Each of the related projects would be evaluated within its own context with consideration of energy conservation features that could alleviate electrical demand. Each related project would be required to be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the Los Angeles Green Building Code. Further, each related project would need to be consistent with how the LADWP serves each location with its existing distribution infrastructure. Therefore cumulative impacts would be less than significant.

Table 3.18-4
Cumulative Estimated Electricity Demand

Land Use	Size	Electricity Rates	Total (kw-h / yr)
Residential	8,216 units	5,626.5 kw-h / unit	46,227,324
Health Club	104,992 sf	12.95 kw-h / sf	1,359,646
Office	3,781,596 sf	12.95 kw-h / sf	48,971,668
School	179 students	10.50 kw-h / sf	178,553
Retail	997,068 sf	13.55 kw-h/sf	13,510,271
Hotel	1,731 rooms	9.95 kw-h / sf	6,889,380
Restaurant	124,737 sf	47.45 kw-h / sf	5,918,771
Bar/Lounge	25,894 sf	47.45 kw-h / sf	1,228,670
Storage	24,900 sf	4.35 kw-h/sf	108,315
		Related Projects	**124,392,598**
		Proposed Project	**812,910**
		Cumulative (Related + Project)	**125,205,508**

[254] *125 / 22,807 x 100% = 0.55%*

Table 3.18-4
Cumulative Estimated Electricity Demand

Land Use	Size	Electricity Rates	Total (kw-h / yr)
sf =square feet; kw-h = kilowatt-hour; yr = year *Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate* *The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.* *Hotel Rooms: average budget room is 300 to 400 square feet. http://www.dimensionsinfo.com/hotel-room-size/.* *This analysis assumes 400 square feet per room.* *School – 95 square feet per student: http://www.cde.ca.gov/ls/fa/sf/completesch.asp* *Table: CAJA Environmental Services, March 2016.*			

Natural Gas

All of the related projects are served by the same natural gas service as the Project (SCG). Given that the Project includes 175 rooms and the related projects include 1,731 hotel rooms, the Project's contribution to the cumulative natural gas demand would not be cumulatively considerable or significant, representing less than 10 percent of the total amount of increase. As such, the Project's contribution to the cumulative natural gas demand would not be substantial. Therefore, Project impacts to natural gas demand would not be cumulatively considerable or significant. These estimates do not account for energy reduction features employed by the Project or related projects. Each of the related projects would be evaluated within its own context with consideration of energy conservation features that could alleviate natural gas demand. Further, each related project would need to be consistent with the building energy efficiency requirements of Title 24 as well as how SCG serves each location with its existing distribution infrastructure.

As shown in Table 3.18-5, Cumulative Estimated Natural Gas Demand, the cumulative projects are estimated to demand approximately a net increase of 50,990,827 cf/month of natural gas. The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the cumulative projects' energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2014 is estimated at 3,101 million cf/day and 2018 is estimated at 3,027 million cf/day. The increase of 1.7 million cf/day represents approximately 0.056 percent of the 2018 peak demand. Thus, there is adequate supply capacity and no impacts would occur.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. 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 related projects would be in compliance with the

City's Green Building Ordinance (for the City of Los Angeles) and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards.

All forecasted growth would incorporate design features and energy conservation measures, as required by Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2018-2030. Thus, there is a plan to secure natural gas supplies to meet demand. Therefore cumulative impacts would be less than significant.

Table 3.18-5
Cumulative Estimated Natural Gas Demand

Land Use	Size	Natural Gas Rates	Total (cf / mo)
Residential	8,216 units	4,011.5 cf / unit	32,958,484
Health Club	104,992 sf	2.9 cf / mo	304,477
Office	3,781,596 sf	2.9 cf / mo	10,966,628
School	179 students	2.9 cf / mo	49,315
Retail	997,068 sf	2.9 cf / mo	2,891,497
Hotel	1,731 rooms	4.8 cf / sf	3,323,520
Restaurant	124,737 sf	2.9 cf / mo	361,737
Bar/Lounge	25,894 sf	2.9 cf / mo	75,093
Storage	24,900 sf	2.9 cf / mo	72,210
		Related Projects	**51,002,961**
		Proposed Project	**(12,134)**
		Cumulative (Related + Project)	**50,990,827**

sf =square feet; cf = cubic feet; mo = month
Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate
The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
Hotel Rooms: average budget room is 300 to 400 square feet. http://www.dimensionsinfo.com/hotel-room-size/.
This analysis assumes 400 square feet per room.
School – 95 square feet per student: http://www.cde.ca.gov/ls/fa/sf/completesch.asp
Table: CAJA Environmental Services, March 2016.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.

4. LIST OF PREPARERS

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