Division of Land / Environmental Review

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

DRAFT ENVIRONMENTAL IMPACT REPORT
Volume I – DEIR Chapters I through IV

HOLLYWOOD COMMUNITY PLAN AREA

Columbia Square Project

ENV-2007-819-EIR
State Clearinghouse No. 2007041112
Council District 13

THIS DOCUMENT COMPRISES THE FIRST PART OF THE ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PROJECT DESCRIBED. THE FINAL EIR WILL COMPRISE THE SECOND AND FINAL PART.

Project Address: 6121 West Sunset Boulevard, Hollywood, CA 90028-6423

Project Description: PPD Gower I, LLC, the Project Applicant, proposes to develop the Columbia Square Project (proposed project) in the Hollywood community of the City of Los Angeles. The Columbia Square Project would provide a vertically integrated mix of uses that will assist in promoting Hollywood as a center of population, employment, retail services and entertainment. Specifically, the project would provide 400 residential units, a 125-room hotel, approximately 380,000 square feet of office space (including entertainment-related office space), and approximately 41,300 square feet of retail and restaurant/bar uses (including restaurant/bar uses in the hotel) on a 4.68-acre site. Included within these project uses is approximately 105,510 square feet of existing building area (91,110 square feet for office and 14,400 square feet for retail/restaurant/bar) that would be retained and rehabilitated from the existing 136,233 square-foot Columbia Square Complex. In addition, a substantial part of the project would include landscaped courtyards and pathways and other open space features connecting the various proposed uses that would establish a more pedestrian-oriented environment within the project vicinity. Amenities such as recreation rooms, swimming pools, and landscaped recreational areas would also be provided for residents and guests. The project would also include a multi-level parking facility (including three subterranean levels) with approximately 2,004 parking spaces.

APPLICANT:
PPD Gower I, LLC

PREPARED BY:
Environmental Review Section
Los Angeles City Planning Department

May 21, 2009

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I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of the Draft Environmental Impact Report (EIR) contains a brief summary of the proposed Columbia Square Project (the project) and its potential environmental effects. More detailed information regarding the project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this Executive Summary of the Draft EIR is an overview of the purpose and focus of the Draft EIR, a general description of the project, a description of the organization of the Draft EIR, an overview of the project, a general description of areas of controversy, a description of the public review process for the Draft EIR, and a summary of the alternatives to the project evaluated in the Draft EIR.

1. Purpose of the Draft EIR

This Draft EIR is a Project EIR, as defined by Section 15161 of the State CEQA Guidelines and, as such, serves as an informational document for the general public and project decision-makers. The City of Los Angeles (City) has the principal responsibility for approving the project and, as the Lead Agency, is responsible for the preparation and distribution of this Draft EIR pursuant to CEQA Statute Section 21067. This Draft EIR shall be used in connection with all other permits and all other approvals necessary for the construction and operation of the project. This Draft EIR shall be used by the City of Los Angeles Department of Planning, Department of Building and Safety, Department of Transportation, and Department of Public Works, including the Bureaus of Engineering and Sanitation, City Council of the City of Los Angeles, and all other responsible public agencies that must approve activities undertaken with respect to the project.

This Draft EIR evaluates the environmental impacts determined by the City to be potentially significant and discusses the manner in which the project's significant effects can be reduced or avoided through the implementation of mitigation measures. Impacts that cannot be mitigated to a level below significance are considered significant unavoidable adverse impacts. In accordance with Section 15130 of the State CEQA Guidelines, this Draft EIR also includes an examination of the effects of cumulative development in the vicinity of the project. Cumulative development includes all anticipated future projects that, in conjunction with the project, may result in a cumulative impact. In addition, this Draft EIR evaluates the extent to which environmental effects could be

reduced or avoided through the implementation of feasible alternatives to the project. Furthermore, the City is responsible for certifying the Draft EIR and adopting any mitigation measures needed to address the project's significant environmental impacts. For projects that result in any unmitigated or under-mitigated significant environmental effects, the City may, after making a series of findings, certify the Draft EIR upon adoption of a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093.

2. Draft EIR Focus and Effects Found not To Be Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on April 25, 2007 for a 30-day review period ending on May 25, 2007. The NOP, Initial Study, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in the Draft EIR. The City of Los Angeles determined through the Initial Study that the project would result in potentially significant impacts in the following issue areas:

- Aesthetics, Views, Light/Glare, and Shading
- Air Quality (including global climate change)
- Cultural Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Noise
- Public Services
    - Fire Protection
    - Police Protection
    - Schools
    - Parks and Recreation
    - Libraries

- Transportation and Circulation (including parking)

- Utilities and Service Systems
  - Water Supply
  - Wastewater
  - Solid Waste

- Population, Housing, and Employment

The City of Los Angeles determined through the Initial Study that the project would not have the potential to cause significant impacts in the following areas: Agricultural Resources, Biological Resources, Geology and Soils, and Mineral Resources. Therefore, these areas are not examined in this Draft EIR. A demonstration that no significant impacts would occur for these issue areas is provided in the project's Initial Study, which is included in Appendix A of this Draft EIR.

3. Draft EIR Organization

The Draft EIR is comprised of the following sections:

I. **Executive Summary.** This section describes the purpose of the Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, project summary, areas of controversy and issues to be resolved, public review process, summary of alternatives, and a summary of environmental impacts and mitigation measures.

II. **Project Description.** This section describes the project location, existing conditions, project objectives, project characteristics, and a description of the intended use of the Draft EIR.

III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built within the project vicinity.

IV. **Environmental Impact Analysis.** This section contains the environmental setting, project and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the following environmental issues: (1) aesthetics, views, light/glare, and shading; (2) air quality; (3) cultural resources; (4) hazards and hazardous materials; (5) hydrology and water quality; (6) land use; (7) noise; (8) fire protection; (9) police protection; (10) schools; (11) parks and recreation; (12) libraries;

(13) transportation and circulation; (14) water supply; (15) wastewater; (16) solid waste; and (17) population, housing, and employment.

V. Alternatives. This section provides analysis of each of the six alternatives to the project including: No Project/No Build Alternative; Remove Studio B/C/All Commercial Alternative; Retain Studio B/C/New Office to Residential Alternative; Development in Accordance with Existing Plans with Height District Change Alternative; Retain Studio B/C/Reduce and Relocate Office Alternative; and Remove Studio B/C/Convert Residential Uses to Office Uses.

VI. Other Environmental Considerations. This section provides a discussion of significant unavoidable impacts that would result from the project and the reasons why the project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the project is also presented here. This section analyzes growth-inducing impacts which the project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Potential secondary effects caused by the implementation of the mitigation measures for the project are also discussed. Last, a discussion of possible effects of the project that were determined within the Initial Study not to be significant is provided.

VII. References. This section lists all the references and sources used in the preparation of the Draft EIR.

VIII. List of Preparers. This section lists all of the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the environmental analysis prepared for the project and appendices as follows:

- Appendix A - Initial Study/NOP/NOP Comment Letters
- Appendix B - Air Quality Worksheets
- Appendix C - Historic Resources Technical Report
- Appendix D - Hazardous Materials Technical Reports
- Appendix E – Hydrology/Stormwater Water Quality Technical Reports
- Appendix F - Noise Worksheets

- Appendix G – LAUSD Correspondence
- Appendix H – LAPD & LAFD Correspondence
- Appendix I - Traffic Impact Study
- Appendix J - Water Supply Assessment
- Appendix K – Water and Wastewater Infrastructure Capacity Information
- Appendix L – Additional Analysis for Alternative 6

4. Overview of the Project

A. Project Location

The project site consists of 4.68 acres (203,861 square feet) generally bound by Selma Avenue to the north, Gower Street to the east, Sunset Boulevard to the south, and El Centro Avenue to the west in the Hollywood Community of the City of Los Angeles (City). The site is approximately six miles northwest of the City's downtown area and approximately 13 miles northeast of the Pacific Ocean.

The Hollywood Freeway (US-101 Freeway) as well as a network of major roadways including Sunset Boulevard, Santa Monica Boulevard, and Hollywood Boulevard provide regional and local access to the project site. The project site, which is located along a major transit corridor, Sunset Boulevard, is well-served by several local and regional bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT). The project site is also located approximately 600 feet from Hollywood Boulevard, which is also a major transit corridor, and is approximately 850 feet south and east of a high-capacity Metro Rapid Bus stop located on Argyle Avenue between Hollywood Boulevard and Selma Avenue. Moreover, the project site is located approximately 1,285 feet (less than one-quarter mile) from the entrance to the Metro Red Line Hollywood and Vine Station located just west of the intersection of Hollywood Boulevard and Argyle Avenue. The project vicinity is highly urbanized and has been undergoing a substantial transformation within recent years.

Land uses surrounding the project site include a mix of office and commercial/retail with associated parking, and residential. Immediately north of the project site at the northeast corner of El Centro Avenue and Selma Avenue, is a four-story parking structure. This structure provides parking for the commercial uses, including a recreation/workout facility and a car wash located north of the parking structure. Directly to the east of the parking structure facing the project site is a two-story office building, the Rich Mar building,

which extends to the northwest corner of Gower Street and Selma Avenue. Located to the east of the project site across Gower Street and north of Harold Way, is a mix of uses including one- and two-story office uses, neighborhood retail uses, and a two-story apartment building. Single-family residential uses are located further to the east of the project site along Harold Way. Located to the east of the project site between Harold Way and Sunset Boulevard is the Sunset Gower Plaza, which includes a bakery, a restaurant and bar, office uses, and associated surface parking. Directly southeast of the project site along Sunset Boulevard and east of Gower Avenue is a range of non-residential uses, including a restaurant, an office building, and the Sunset Gower Studios. Immediately south of the project site along the south side of Sunset Boulevard and west of Gower Street is a commercial strip mall, the "Gower Gulch," which includes a mix of restaurant and retail establishments, a grocery store, and surface parking. Immediately southwest of the project site, along the south side of Sunset Boulevard and west of El Centro Street, is a car wash and commercial uses. Office uses and one- and two-story multi-family residential are located further south of the uses that front Sunset Boulevard. Directly to the west of the project site north of Sunset Boulevard and west of El Centro Avenue is the Hollywood Palladium event venue and associated surface parking. The 21-story House of Blues office building (Sunset Media Tower) is also located along Sunset Boulevard further west of the project site. Northwest of the project site at the northwest corner of El Centro Avenue and Selma Avenue, is a mix of one- and two-story commercial and office uses with associated parking.

With the exception of the properties fronting the east side of Gower Street, which are designated by the Hollywood Community Plan for Highway Oriented Commercial land uses, and the parking lot of the Hollywood Palladium event venue along the west side of El Centro Avenue and the property located on the southeast corner of Sunset Boulevard and Gower Street, which are designed for Commercial Manufacturing land uses, the majority of the adjacent and surrounding properties are designated for Regional Commercial land uses by the Hollywood Community Plan.

B. Project Characteristics

The project proposes development of a vertically integrated mix of uses that will assist in promoting Hollywood as a center of population, employment, retail services and entertainment. Specifically, the project would provide 400 residential units, a 125-room hotel, approximately 380,000 square feet of office space, and 41,300 square feet of retail and restaurant/bar uses (including restaurant/bar use in the hotel) on a 4.68-acre site. Included within these project uses, approximately 105,510 square feet of the 136,233-square-foot Columbia Square Complex would be rehabilitated to provide for approximately 91,110 square feet of office uses and 14,400 square feet of retail and restaurant/bar uses. In addition, a substantial part of the project would include landscaped courtyards and pathways and other open space features connecting the various proposed uses that would

establish a more pedestrian-oriented environment within the project vicinity. The project would also include a nine-level parking facility (including three subterranean levels) with approximately 2,004 parking spaces. The following describes in greater detail the major components of the project.

(1) Residential

The residential component of the project consists of 400 multi-family residential units located within buildings sited along El Centro Avenue, Selma Avenue, and Gower Street and ranging from eight stories to 40 stories in height. The majority of the residential units would be located in the 40-story residential tower sited in the northwest corner of the project site. The tower would reach a building height of approximately 447 feet with other elements such as the helipad extending to 487 feet and architectural features extending to 512 feet. The residential units would be located within the upper 33 stories of the 40-story tower, above the seven stories of hotel uses. Town homes would be located within the eight-story structure along Selma Avenue, as well on the top two stories (7th floor and 8th floor) of the eight story building fronting Gower Street, above the office uses. The residential uses would comprise a total of 586,000 square feet of floor area including lobby areas, vestibules, stairs, and residential storage. Access to the residential units would be via elevators from two resident-only pedestrian lobbies, one located off El Centro Avenue, the other off Selma Avenue. Architectural materials would likely include items such as varying spandrel glass, clay/terracotta rain screen tiles, stainless steel cable balcony railing, and architectural smooth finish concrete.

(2) Hotel

The hotel component of the project would be located along El Centro Avenue just south of and below the 40-story residential tower. The hotel would comprise the first seven stories (or approximately 75 feet) of the residential tower and include 125 rooms. The hotel would feature a small ground level lobby adjacent to a valet drop off that would provide elevators to take guests and visitors to the 7th floor (the podium level) where the main lobby and restaurant would be, while the rooms would be located on levels two through six and the podium level (the 7th floor). Approximately 20 to 25 hotel rooms would be located on each of the floors. The hotel use would consist of approximately 98,500 square feet of floor area including ancillary uses such as the lobby, registration desk, hotel office, and laundry areas. Amenities including a swimming pool and landscaped recreational areas for the guests would also be provided on the podium level. Access to the hotel would be via the ground level or the elevator adjacent to the parking structure. Architectural materials utilized for the hotel would likely include items such as varying spandrel glass, an aluminum curtain wall, clay/terracotta rain screen tiles, stainless steel cable balcony railing, and architectural smooth finish concrete.

(3) Office

The office uses (which would include entertainment-related office and studio uses), would be located within buildings located primarily in the southern portion of the project site along El Centro Avenue, Sunset Boulevard, and Gower Street and would range in height from one story to 14 stories. The majority of office uses would be located in the 14-story high-rise building located in the southeast portion of the project site along Gower Street. This building would be approximately 204 feet tall with other elements such as the helipad extending to 224 feet and architectural features extending to approximately 260 feet. In addition, office uses would be located on the first six floors of the eight-story building proposed along Gower Street. The existing Radio Building, Studio A, and Television Building of the Columbia Square Complex fronting Sunset Boulevard would remain and would be rehabilitated for some office uses. Overall, the project proposes approximately 380,000 square feet of office space, of which 91,100 square feet would be comprised of rehabilitated office space within the existing Columbia Square Complex. The rehabilitated space would conform to the Secretary of the Interior Standards. Architectural materials utilized for the office would likely include items such as varying spandrel glass, an aluminum curtain wall, clay/terracotta rain screen tiles, stainless steel cable balcony railing, tempered glass balcony

(4) Commercial/Restaurant/Bar

Retail uses and a café would be located on the ground floor of the 14-story office building. A two-story restaurant is also proposed near the southwest portion of the project site along El Centro Avenue adjacent to the hotel porte-cochere. In addition, retail and restaurant/bar uses would be provided as part of the hotel on the ground-floor and on the podium level (7th floor) of the residential tower. The location of the pedestrian-oriented retail uses and café on the ground level of the proposed office building, as well as the proposed ground level retail and two-story restaurant would complement the off-site commercial, retail, and office uses located along Sunset Boulevard, Gower Street, and El Centro Avenue. Overall, the project proposes a total of approximately 41,300 square feet of retail and restaurant/bar space, of which 14,400 square feet would be comprised of rehabilitated retail and restaurant/bar space within the existing Columbia Square Complex.[1]

(5) Parking and Site Access

The project would include a nine-level parking facility with approximately 2,004 parking spaces located within the central portion of the site. Three lower levels of

[1] *The project would include a mix of retail and restaurant/bar uses that would total 41,300 square feet. Of this 41,300 square feet, a maximum of 31,000 square feet could be developed as restaurant/bar uses.*

the parking facility would be subterranean, while the upper levels would begin from ground level and form the podium upon which the residential tower and townhomes would be located. The parking facility would be physically integrated with surrounding development within the interior of the site such that it would be surrounded by the residential tower to the west, the townhomes to the north, the office and townhomes to the east, and the existing buildings to the south and therefore, would generally not be visible from surrounding areas. Vehicular access to the parking structure would be provided at El Centro Avenue, Selma Avenue, and Gower Street.

(6) Recreation, Open Space, and Landscape Plan

The project would provide substantial open space, landscaping and amenities for project residents, guests and tenants, as well as for the general public. Publicly accessible landscaped open space would consist of two public courtyards and a pocket park located on the ground level. One of the public courtyards would consist of the existing courtyard (the Sunset Courtyard) fronting Sunset Boulevard that is a part of the Columbia Square Complex. As part of the project, this courtyard would be renovated, re-landscaped, and reintroduced as a new pedestrian-oriented amenity for the greater community. More specifically, the courtyard would connect to other green spaces on-site and create a walkable district, enabling residents and visitors to walk through and enjoy the project site. The second courtyard would be located at the northwest corner of the site and would be enhanced with pedestrian pathways and accent paving. The pocket park would be located in the northeast corner of the project site (at the corner of Selma Avenue and Gower Street). Additional amenities for project residents would include fitness and recreation rooms, large central courtyards and gardens on the podium level, two swimming pools, entertaining patios, sunning areas, and landscaped recreational areas. Overall, the project would provide a total of approximately 76,400 square feet of open space consisting of approximately 59,000 square feet of active and passive common open space and approximately 17,400 square feet of private open space amounting to approximately 40 percent of the project site.[2] The project would create a walkable community, enabling residents and visitors to walk through and enjoy the project site.

Landscaping including ornamental trees would be provided along the perimeter of the site as well along pedestrian walkways integrated throughout the project site. In addition, the plaza along Sunset Boulevard, as well as the podium level adjacent to the two proposed pools would be landscaped. As shown in Figure II-9, the ground level of nearly

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[2] *Open space is based on the definition of open space provided in Section 12.21 of the LAMC and includes common and private open space areas. Please refer to Section IV.G.5, Parks and Recreation, for further discussion.*

all of the buildings provides pedestrian links to the surrounding environs, as well as to the interior common recreation areas. Multiple access points and a mix of landscaped public and private open space, including several large courtyards, will connect and integrate all elements of the project. Pathways would be defined and open to pedestrians traversing the block or connecting to elements within it.

(7) Sustainable Design Features

The project would be designed and built to achieve certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program at the "Silver" level through the incorporation of green building techniques and other sustainability features.

(8) Construction

To accommodate the proposed uses, Studio B/C (4th Wing) would be removed and approximately 105,510 square feet of existing floor area of the Columbia Square Complex located in the southern portion of the project site would be rehabilitated to conform to the Secretary of the Interior Standards. Project implementation would result in approximately 30,723 square feet of demolition and the construction of approximately 1,000,290-square feet of floor area contained within a number of new multi-story structures on the project site. The construction schedule for the project would be approximately 48 months from the start of grading and excavation activities to the receipt of certificates of occupancy. It is anticipated that construction of the project would commence in 2009 with completion in 2013. Project construction activities would commence with the demolition of approximately 30,723 square feet of existing structures. This phase is expected to occur over approximately four to six months. The grading and excavation activities would occur over approximately four to six months. Construction of the proposed buildings would occur over a two-year period, with building finishes occurring in the last 12 months. During construction, approximately 190,000 cubic yards of soil would be exported. Construction vehicles would access the site from Sunset Boulevard via the US-101 Freeway.

C. Discretionary Actions Requested and Permits Required

Approvals required for the project would include, but may not be limited to, the following:

- Community Redevelopment Agency Board Approval to develop a floor area ratio (FAR) of up to 5.42:1.

- Community Redevelopment Agency Board approval of an Owner Participation Agreement (OPA) to permit development in excess of a 4.5:1 FAR.
- City Council approval of a development agreement.
- General Plan Amendment to amend the existing Hollywood Community Plan land use designation for the site from "Commercial Manufacturing" Industrial to the "Regional Center" Commercial land use designation in lieu of the existing Commercial Manufacturing designation; and pursuant to Hollywood Community Plan's policies with regard to Section 506.2.3 of the Hollywood Redevelopment Plan, permit a floor area ratio of 5.42:1.
- Vesting Zone Change from [Q]C4-1VL-SN to C4-2-SN Zone.
- Height District Change to permit Height District Number 2, in lieu of Height District 1VL.
- Vesting Conditional Use Permit (CUP) to permit the following:
  - Motion picture and television studios and related incidental uses in a C4 Zone.
  - A hotel within 500 feet of an R Zone.
  - Live entertainment/patron dancing.
  - On- and off-site sales and consumption of a full line of alcoholic beverages.
- Site Plan Review to allow a development project that creates 50,000 gross square feet or more of nonresidential floor area, creates an increase of 50 or more dwelling units, or adds 1,000 or more average daily trips.
- City Planning Commission approval to allow a Phased Development that will be constructed in consecutive or overlapping phases over a 10-year period.
- Zone variance to allow a restaurant with an outdoor eating area not on the ground floor.
- Vesting Tentative Tract Map.
- Demolition, grading, excavation, foundation, and associated building permits.
- Haul Route Approval.
- Encroachment Permit to encroach approximately 5 feet underneath Gower Street to construct a portion of the parking structure.

- Signage approvals pursuant to the guidelines and policies of the Hollywood Signage Supplemental Use District.

- Certification of an Environmental Impact Report and adoption of a Mitigation Monitoring and Reporting Program.

- Coverage under the National Pollution Discharge Elimination System (NPDES) Permit by the Los Angeles Regional Water Quality Control Board.

- Issuance of all required ministerial permits necessary to implement the project (e.g., grading, building, certificate of occupancy, water, sewer, storm drain, etc.) by the City of Los Angeles.

- Any additional actions as may be deemed necessary.

5. Background and Existing Site Conditions

Historically, uses on the site have included radio and television studio and offices, as well as single family and duplex residential. The project site was originally divided into two square blocks with an east-west street (first known as Salem Place and then as Harold Way) bisecting the site into two parcels. Occupied by the Blondeau Tavern beginning in 1899, use of the southern parcel shifted to motion picture production in 1911. The original structure associated with the CBS Columbia Square Complex (previously known as the KNX/CBS studios), which was designed by William Lescaze, opened in 1937. The complex, located on the southern parcel of the project site, was built to include the newest and most innovative ideas in both the radio business as well as the growing television world.

The CBS Columbia Square Complex (Columbia Square Complex) was designed in an International style. Three of the buildings or wings that the complex houses, the Radio Building, Studio A, and the Television Building, were completed in 1937. The Radio Building (1st Wing) is five stories with a basement level, a mezzanine, and roof-top penthouse. Studio A (2nd Wing) is a two-story structure with a basement. The Television Building (3rd Wing) is a one-story structure with a mezzanine and a basement. A fourth building or wing, a two-story addition known as Studio B/C (4th Wing), was built directly to the northeast of the existing buildings in 1938. Studio B/C was designed by Parkinson and Parkinson.

The project site has been home to a group of radio and television studios since 1937. The radio stations KNX, KCBS-FM (formerly KNX-FM), and television stations KCBS-TV (Channel 2, formerly KNXT and KTSL) have had their studios at the project site. Independent television station KCAL-TV (formerly KHJ-TV) moved to the Columbia Square

Complex in 2002 from studios adjacent to CBS' then-corporate sibling Paramount Pictures, and has since relocated from the site. The CBS Television Network, originally based at the Columbia Square Complex, built a new facility to accommodate its larger production needs in Studio City in the San Fernando Valley, which opened in November 1952. In 2005, CBS began to move and consolidate its operations at the Columbia Square Complex in Hollywood to Studio Center in Studio City.

The project site is presently improved with four structures of the Columbia Square Complex, occupying a total of 136,233 square feet of floor area that front along Sunset Boulevard. These buildings are currently utilized as entertainment-related, production, and post-production offices and studios. The remaining northern portion of the project site consists of an asphalt-paved surface parking lot generally used by on-site tenants and their guests. The parking lot is accessed from El Centro Avenue via a security kiosk located near the El Centro Avenue entrance and is patrolled by security 24 hours a day. The project site also contains a planted courtyard facing Sunset Boulevard, and there is limited landscaping consisting of ornamental trees including fig, crabapple, lemon bottlebrush, southern magnolia, California fan palm, jacaranda, and Mexican fan palm provided primarily along the perimeter of the site. The trees are in varying degrees of health, and none of them are protected by the City's Protected Tree Ordinance. The project site is currently fenced off, with access limited to the tenants and their guests. The project site is generally flat, with a topography that gently slopes down from the north to the south.

The project site is located within the Hollywood Community Plan Area, the City of Los Angeles State Enterprise Zone, the Hollywood Signage Supplemental Use District (HSSUD), and the Central City Revitalization Zone. In addition, the project site is located within the Hollywood Project Area of the Community Redevelopment Agency, as well as the Adaptive Reuse Incentive Area. The project site is designated for Commercial Manufacturing Industrial land uses pursuant to the City's General Plan Framework and the Hollywood Community Plan. In addition, the project site is zoned as [Q]C4-1VL-SN. The "[Q]" portion of this designation indicates that "Qualifying Conditions" apply to the project site. The "C4" portion of this designation indicates that the project site is zoned for Commercial uses, while the "1VL" portion of this designation indicates that the project site is within a Very Limited Height District No.1, which restricts building heights to a maximum of 45 feet and three stories. The "SN" portion of this zoning designation indicates that the project site is within the Hollywood Signage Supplemental Use District.

6. Areas of Controversy/Issues to be Resolved

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant unavoidable impact has been identified. These areas may include aesthetics, air quality,

historic resources, noise, and traffic. Based on the NOP comment letters, issues known to be of concern in the community include potential noise, traffic, parking, open space and recreation, and shading impacts associated with operation of the project.

7. Public Review Process

The City of Los Angeles circulated an NOP for a 30-day review period, beginning April 25, 2007 and ending May 25, 2007. In addition, a public scoping meeting was conducted on May 10, 2007. The NOP letters and comments received during the comment period as well as comment sheets from the public scoping meeting are included in Appendix A of this Draft EIR. This Draft EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding the Draft EIR.

8. Summary of Alternatives

The Draft EIR examined six alternatives to the project in detail, which include: No Project/No Build Alternative; Remove Studio B/C/All Commercial Alternative; Retain Studio B/C/New Office to Residential Alternative; Development in Accordance with Existing General Plan Designation with Height District Change Alternative; Retain Studio B/C/Reduce and Relocate Office Alternative; and Remove Studio B/C/Convert Residential Uses to Office Uses. A general description of these Alternatives and a comparative summary of their impacts relative to the project are provided below.

Alternative 1: No Project/No Build Alternative

The No Project/No Build Alternative assumes that the project would not be approved and no new development would occur within the project site. Thus, the physical condition of the project site would remain as it is today. No new buildings would be constructed, and none of the existing buildings would be demolished or rehabilitated. The existing facilities would continue to function as they do currently. Internal circulation and parking at the project site would also remain unchanged.

Implementation of the No Project/No Build Alternative would not result in new environmental impacts, and overall would result in a reduced level of impact when compared to the project. Additionally, all of the significant and unavoidable impacts (i.e., aesthetics, air quality, historic resources, noise, and transportation and circulation) associated with the project would be avoided under this Alternative. However, under the No Project/No Build Alternative, the objectives (as discussed in Section II, Project Description) established for the project would not be attained.

Alternative 2: Remove Studio B/C (4th Wing)/All Commercial Alternative

The Remove Studio B/C (4th Wing)/All Commercial Alternative (Alternative 2) assumes the development of all commercial uses. Similar to the project, Studio B/C (4th Wing) would be removed and of the 136,233 square feet of Columbia Square Complex space currently located on the southern portion of the site, a total of approximately 105,510 square feet would be rehabilitated. The rehabilitated space would include 91,110 square feet for office uses and 14,400 square feet for retail and restaurant/bar uses.

As compared to the project, the Remove Studio B/C (4th Wing)/All Commercial Alternative would increase the amount of commercial uses within the site and no residential uses would be developed. Specifically, this Alternative would include the development of a 300-room hotel, approximately 541,990 square feet of new office uses, and 26,900 square feet of new retail and restaurant/bar uses. When including the building areas to be rehabilitated, this Alternative would result in approximately 633,100 square feet of office uses and approximately 41,300 square feet of retail/restaurant uses. In addition, implementation of this Alternative (including rehabilitation of some of the existing uses) would result in an overall total of 924,629 square feet of on-site uses representing a 4.5 FAR.

Alternative 3: Retain Studio B/C (4th Wing)/New Office to Residential Alternative

The Retain Studio B/C (4th Wing)/New Office to Residential Alternative (Alternative 3) would rehabilitate the majority of the existing uses on the site and would convert all of the project's proposed office uses to additional residential uses. In addition, Studio B/C (4th Wing) currently on the site, which would be removed with the project, would be retained under this Alternative. Specifically, of the 136,233 square feet of Columbia Square Complex uses currently located on the southern portion of the site, a total of approximately 132,916 square feet would be rehabilitated (compared to the project's 105,510 square feet proposed for rehabilitation). The rehabilitated space would include 103,343 square feet for office uses, 15,173 square feet for lobby/amenities uses, and 14,400 square feet for retail/restaurant uses. In addition, this Alternative would include the development of 630 residential units (an increase of 230 units over the project), a 125-room hotel, and approximately 20,100 square feet of new retail/restaurant uses. Implementation of this Alternative (including rehabilitation of some of the existing uses) would result in an overall total of 1,067,516 square feet of uses on the site representing a 5.2 FAR.

Alternative 4: Development in Accordance with Existing General Plan Designation with Height District Change Alternative

Under the Development in Accordance with Existing General Plan Designation with Height District Change Alternative (Alternative 4), of the 136,233 square feet of Columbia Square Complex uses currently located on the site, approximately 132,916 square feet would be rehabilitated. Specifically, this Alternative would include 118,516 square feet of rehabilitated office and 14,400 square feet of rehabilitated retail/restaurant uses. In contrast with the project, Studio B/C (4th Wing) would be retained. Relative to new uses on the site, this Alternative would result in the development of 160,000 square feet of new office and 13,100 square feet of new retail/restaurant uses. When accounting for the office uses and retail/restaurant uses within the renovated buildings, this Alternative would result in a total of 278,516 square feet of office uses and 27,500 square feet of retail/restaurant uses. No residential or hotel uses are proposed with this Alternative. This Alternative's overall total development of 306,016 square feet would reflect a 1.5 FAR on the site, consistent with the current zoning.

Alternative 5: Retain Studio B/C (4th Wing)/ Reduce and Relocate Office Alternative

The Retain Studio B/C (4th Wing)/Reduce and Relocate Office Project Alternative (Alternative 5) would retain the 4th Wing (Studio B/C) of the existing Columbia Square Complex currently on the site and would reduce the overall amount of development for the proposed Columbia Square Project. Specifically, of the approximately 136,233 square feet of uses currently located within the Columbia Square Complex on the southern portion of the site, a total of approximately 132,916 square feet would be rehabilitated (compared to the project's 105,510 square feet proposed for rehabilitation). The rehabilitated space would include approximately 103,343 square feet for office uses and approximately 29,573 square feet of retail/restaurant uses. This Alternative would include the development of 404 residential units and a 125-room hotel. This Alternative would also result in a reduction in new office and retail/ restaurant uses as compared to the project. This Alternative would include 72,069 square feet of office uses and approximately 20,100 square feet of retail/restaurant uses within new construction. When accounting for the for the building areas to be rehabilitated, Alternative 2 would result in approximately 175,412 square feet of office uses and approximately 49,673 square feet of retail/restaurant uses. Implementation of this Alternative (including rehabilitation of some of the existing uses) would result in an overall total of 917,829 square feet of uses on the site representing a 4.5 FAR.

Alternative 6: Remove Studio B/C (4th Wing)/Convert Residential Uses to Office Uses Alternative

The Remove Studio B/C (4th Wing)/Convert Residential Uses to Office Uses Alternative (Alternative 6) would convert a portion of the project's proposed residential uses to additional office uses and would result in a reduction in overall development within the site when compared with the project. Similar to the project, the Studio B/C (4th Wing) would be removed and a total of approximately 105,510 square feet of the existing Columbia Square Complex space would be rehabilitated. The rehabilitated space would include 91,110 square feet for office use and 14,400 square feet for retail and restaurant/bar uses. Similar to the project, this Alternative would also result in the development of a 125-room hotel and approximately 41,400 square feet of retail/restaurant uses. Upon completion, implementation of this Alternative (including rehabilitation of some of the existing uses) would result in an overall total of 875,510 square feet of on-site uses representing a 4.3 floor area ratio (FAR). Thus, when compared with the project, this Alternative would result in a reduction of 230,290 square feet of new development.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The Guidelines also state that should it be determined that the No Project/No Build Alternative is the Environmentally Superior Alternative, the Draft EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. An Environmentally Superior Alternative is an alternative to the project that would reduce and/or eliminate the significant, unavoidable environmental impacts associated with the project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the project.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative (Alternative 1 - No Project/No Build Alternative), a comparative evaluation of the remaining alternatives indicates that Alternative 4 Development in Accordance with Existing Plans would be the Environmentally Superior Alternative. This Alternative would reduce more of the project impacts than any of the other remaining alternatives and would meet more of the project objectives than any of the other remaining alternatives.

9. Summary of Environmental Impacts and Mitigation Measures

Table I-1 on page I-19 provides a summary of the environmental impacts of the project. These impacts are summarized as follows:

A. Aesthetics, Views, Light/Glare, and Shading

(1) Aesthetics/Visual Quality

(a) Short-term Construction

During construction, the project site's visual appearance would be altered due to the removal of existing structures, site preparation and grading, and the construction of project buildings and landscaping. Additionally, equipment and materials may be staged on-site and temporary facilities may be located on-site. Construction activities for the project would be visible to adjacent land uses as well as pedestrians and motorists on adjacent streets. Temporary fencing would be placed along the periphery of the site to screen much of the on-site construction activity from view from the street level.

Project construction activities may require the removal of several mature street trees bordering the site, which would reduce the visual quality of adjacent streets during the construction period. However, the project's proposed landscape plan would replace all removed street trees and increase overall landscaping features. Since the loss of street trees would be temporary and such trees would ultimately be replaced, the removal of street trees during construction would not substantially alter, degrade or eliminate the existing visual character of the area.

Visible construction activities would also include truck traffic to and from the site. However, the impact of construction trucking would not significantly impact the visual quality of the area, since the local major roadways are intended to accommodate a range of vehicle types, including trucks incidental to construction and deliveries. Furthermore, construction-related visual impacts would only occur on a short-term basis. Thus, with incorporation of Mitigation Measure A-1, construction-related visual quality impacts would be less than significant.

Table I-1
Summary of Environmental Impacts of the Project

Environmental Issue	Project Impact
A. AESTHETICS, VIEWS, LIGHT/GLARE AND SHADING	
Construction	Less Than Significant with Mitigation
Aesthetics/Visual Quality	Significant and Unavoidable
Views	Significant and Unavoidable
Light/Glare	Less Than Significant with Mitigation
Shading	Less Than Significant
B. AIR QUALITY	
Construction	
Regional Emissions	Significant and Unavoidable
Local Emissions	Less Than Significant
Operation	
Regional Emissions	Significant and Unavoidable
Local Emissions	Less Than Significant
Toxic Air Contaminants	Less Than Significant
Greenhouse Gas	Less Than Significant
Odors	Less Than Significant
C. CULTURAL RESOURCES	
Historic Resources	Significant and Unavoidable
Archaeological Resources	Less Than Significant with Mitigation
Paleontological Resources	Less Than Significant with Mitigation
D. HAZARDS AND HAZARDOUS MATERIALS	
Hazards and Hazardous Materials	Less Than Significant with Mitigation
E. HYDROLOGY AND WATER QUALITY	
Construction	
Hydrology	Less Than Significant
Water Quality	Less Than Significant
Operation	
Hydrology	Less Than Significant
Water Quality	Less Than Significant
F. LAND USE	
Consistency with Plans	Less Than Significant
Land Use Compatibility	Less Than Significant
G. NOISE	
Construction	Significant and Unavoidable
Operation	Less Than Significant with Mitigation

Table I-1 (Continued)
Summary of Environmental Impacts of the Project

Environmental Issue	Project Impact
H. PUBLIC SERVICES	
Fire	
Demand on Services	Less Than Significant
Consistency with Regulations	Less Than Significant
Police	Less Than Significant
Schools	Less Than Significant
Parks and Recreation	Less Than Significant with Mitigation
Libraries	Less Than Significant
I. TRANSPORTATION AND CIRCULATION	
Construction	
Traffic	Less Than Significant with Mitigation
Operation	
Intersections	Significant and Unavoidable
Neighborhood Street Segments	Significant and Unavoidable
Freeway Segments	Less Than Significant
Public Transit Service	Less Than Significant
Parking	Less Than Significant
J. UTILITIES AND SERVICE SYSTEMS	
Water Supply	Less Than Significant with Mitigation
Wastewater	Less Than Significant
Construction	Less Than Significant
Operation	Less Than Significant
Solid Waste	
Construction	Less Than Significant
Operation	Less Than Significant
K. POPULATION, HOUSING, AND EMPLOYMENT	
Population, Housing, and Employment Growth	Less Than Significant

Source: Matrix Environmental, 2009.

(b) Operation

Implementation of the project would replace Studio B/C and the associated surface parking lot with a denser configuration of new buildings integrated by landscaped courtyards and pedestrian walkway areas. The project would provide a mixed-use site with varied residential, business, and community-serving commercial uses. The project's uses would be compatible with the residential uses to the northeast and east of the site, as well as the surrounding commercial uses along Sunset Boulevard and other neighboring streets. The project's extensive landscaping, particularly within the renovated courtyard along Sunset Boulevard, would enhance the appearance of the site and, in conjunction with ground floor retail uses, would promote pedestrian activity in the area. Furthermore, the project's increase in density and building height would be in character with the area given the nature of other new high-density development recently completed and/or underway throughout the vicinity. Thus, the project would not degrade the visual character of the project site. Nonetheless, the project would substantially alter some of the valued visual resources on-site and would introduce elements that contrast with the current aesthetic image of the site and neighborhood.

The existing Columbia Square Complex buildings are considered historic resources under CEQA. As discussed in Section IV.C, Cultural Resources, of this Draft EIR, the removal of Studio B/C (4th Wing) of the Columbia Square Complex constitutes a significant adverse change to a historic resource. However, the Radio Building, Television Building, and Studio A along Sunset Boulevard would be rehabilitated in accordance with the Secretary of Interior Standards. As also discussed in Section IV.C, Cultural Resources, the location of the new office building that would replace Studio B/C would not provide adequate distance from the remaining historic buildings. The size and scale of the office building would significantly alter historic spatial relationships and the experience of the Columbia Square Complex from its public spaces. As such, the contrast in size and scale introduced by project development relative to the existing historic buildings on-site would be considered a significant aesthetic impact.

The proposed improvements to the Sunset Courtyard along Sunset Boulevard would be considered a beneficial impact relative to aesthetics, as this courtyard would be renovated, re-landscaped, and reintroduced as a new pedestrian-oriented amenity for the greater community, thus enhancing the appearance of the site. The new courtyard would connect to other green spaces on-site and create a walkable district, enabling residents and visitors to walk through and enjoy a vast majority of the project site. Aesthetic impacts associated with renovation of the Sunset Courtyard would therefore be less than significant. The project would include attractive lighting, for purposes of providing security and aesthetic enhancements, while also being sensitive to nearby properties. In addition, the substantial increase in landscaping and the creation of pedestrian paths throughout the site would improve the character of the site. While the existing sense of openness embodied within the central portion of the site would be eliminated, the current parking lot

is not a natural open space and therefore, its redevelopment would not constitute the removal of a valued visual resource. Further, the project would create new open spaces with landscaping, particularly on the podium level where a recreation area and amenities would be provided for project residents and guests.

Relative to surrounding development, a somewhat non-cohesive visual character is evident throughout the project area due to the eclectic nature of existing land uses and their associated variations in architecture, building heights and materials. Further, the project area continues to grow and transform, with new and ongoing development incorporating dense mixed uses with mid- and high-rise buildings. Nonetheless, given the proximity of the Selma-La Baig Historic District, which consists of a neighborhood of primarily one-story single-family Craftsman style residences, project development would introduce a substantial degree of contrast with the aesthetic image of the nearby historic district. Specifically, the greater size, scale, mass and density of the project would be highly visible from various streets and properties to the east, including those within the district (Harold Way, Selma Way, and La Baig Avenue), thus altering the visual context of the neighborhood (refer to the photo simulations in the views analysis below for further details). Presently, due to the low profile of much of the surrounding context, the visual character of the historic district is still predominant and intact. As such, the visual contrast introduced by the project relative to the adjacent residential neighborhood would be considered a significant aesthetic impact.

Despite the increase in building height and density, the project would not contrast sharply with surrounding commercial and mixed use development or other more distant properties. Views of the project and surrounding properties along an east-west axis, as viewed looking north, demonstrate that, while the height of the residential tower would be evident, the proposed building massing and density would not differ substantially from other nearby developments. Similarly, views of the project and surrounding properties along a north-south axis and viewed to the west, demonstrate that the bulk and density of the project appears compatible with the surrounding properties. The project's vertical vernacular would provide a transition between the surrounding commercial uses while allowing for a higher density development within the site. The project would be designed to provide substantial and striking visual interest, since all of the buildings would vary in height, bulk and massing, thus creating an identity that is distinctive yet compatible with surrounding uses. The project would also incorporate design elements with an architectural theme that complements the existing character of the Sunset Boulevard commercial corridor. Further, project parking has been designed in a manner that would render it generally hidden from off-site public views, with the exception of driveway entrances and exits. As such, the aesthetic impact of the project relative to surrounding commercial and mixed use development would be less than significant.

(2) Views

View resources within the project area that are available from public vantages include: (1) the existing on-site Columbia Square Complex buildings within the project site, which are considered historic resources; (2) the Hollywood Sign, a City-designated historic monument, and the Hollywood Hills located to the north, which provide an important scenic backdrop to large portions of the metropolitan Los Angeles area; (3) the Hollywood Boulevard Commercial and Entertainment District, which includes numerous historic structures and provides views of the urban streetscape (and which, in general, are not visible from the project site); (4) historic structures along Sunset Boulevard, such as the nearby Cinerama Dome, Hollywood Palladium event venue, and the Columbia Square Complex; and (5) the Selma-La Baig Historic District.

(a) North-Facing Views

Long-range northerly views in the area, while intermittent, may well be considered some of the most valued views available given the visibility of the scenic Hollywood Hills and Hollywood Sign that help define the visual character of the Hollywood Community. The residential tower and 14-story office building of the project would be highly visible from many locations to the south and southeast. Project structures would partially obstruct views of the Hollywood Hills and the Hollywood Sign. However, such views are currently available on an intermittent basis along certain portions of local roadways, and would continue to be available on an intermittent basis along roadway segments throughout the project area, including El Centro Avenue and Gower Street. Impacts along the length of Sunset Boulevard, a designated scenic highway, would be similar, with intermittent obstruction of the Hollywood Hills and the Hollywood Sign from certain vantages. However, the project would not eliminate northerly views of the view resources in the area. It is further noted that views of the remaining Columbia Square Complex buildings, which are considered historic resources, would be maintained, including along Sunset Boulevard. Moreover, the project would align the proposed buildings in a way that permits a variety of long range views for building occupants, including views of the Hollywood Hills, the Hollywood Sign, and various contributing historic resources within the Hollywood Boulevard Commercial and Entertainment Historic District.

Vantages from further south of the site will also have views of the Hollywood Hills ridgeline obstructed by project development. Though total obstruction may be experienced from specific locations, other nearby vantages would experience partial obstruction or no obstruction (for example, from the centerline of El Centro Avenue looking north). Further, the ridgeline does not feature prominently into northerly views from some vantages due to existing intervening structures and vegetation. Thus, the project would not dramatically alter the overall view experience throughout the area. Similarly, views of the distant ridgeline are minimal, with Griffith Park Observatory barely detectible in the background. The project would obstruct such views from certain vantages, but views would continue to

be available on an intermittent basis, as is the case under current conditions. Overall, view impacts along Sunset Boulevard would be limited to certain vantage points and would not affect long segments of the scenic highway. Further, it is noted that the Hollywood Hills rise to an elevation of approximately 1,100 feet with the Hollywood Sign located near the ridgeline, well above the maximum heights of the proposed buildings. Thus, throughout the area south of the hills, intermittent views of these visual resources will continue to be available. Therefore, the project would not substantially obstruct existing views of visually prominent resources, and impacts would be less than significant.

(b) South-Facing Views

Project implementation would alter views of the skyline, and the new structures would be visible from nearby and elevated view points. From Gower Street at Hollywood Boulevard (a scenic highway), and from a closer vantage along Gower Street, views of valued visual resources are generally not available under existing conditions, and thus, none would be obstructed by the project. The current sense of openness within the project site (i.e., the open sky above the site) would be reduced, but would not be eliminated entirely and would continue to exist elsewhere throughout the area wherever mid-range views of low-profile development exist. In general, while views of project development would be available from Hollywood Boulevard, valued views from this scenic highway would not be substantially affected (except as described above). Additionally, the existing view corridor along Gower Street would remain.

As distance increases from the project site, proposed development would feature less dominantly within southerly views. Photo simulation illustrates that while the upper stories of the new towers would be clearly visible, intervening structures and landscaping would partially obscure views of the project.

A panoramic view of the project site and surrounding cityscape from the Hollywood Hills at North Sycamore Avenue, located approximately 2.4 miles northwest of the project, indicates that views from this vantage point would experience minor interruption of the distant horizon due to the project; however, the horizon line is presently interrupted by existing mid- and high-rise buildings in the area, as well as the downtown Los Angeles skyline in the distance, and thus the project would not represent a substantial change from existing conditions. Further, such views clearly illustrate the highly urbanized nature of the area between the Hollywood Hills and downtown. The project would continue to appear as part of the fabric of urban development and would not block or otherwise degrade a valued scenic vista. While the proposed residential building would be clearly discernable given its height, the project as a whole would alter views little, if any, in the context of the greater urban landscape. As previously mentioned, long-range views from the Hollywood Hills are generally not sensitive to individual development projects, like the project, since such projects are subordinate to broader views of the urban landscape. Similarly, from vantage points located northeast of the project site, taken at Griffith Observatory (located nearly

1.8 miles to the northeast) and North Beachwood Drive (approximately 2.1 miles to the north-northeast), the project towers would blend in with the surrounding urban environment. Due to their height and mass, the new structures would be clearly discernable, but would not substantially alter views in the context of the greater urban landscape. Due to the distance and change in elevation, the project would not block or otherwise degrade a valued scenic vista from such vantages.

Similar effects would be expected from vantage points throughout the Hollywood Hills, including from other public roadways as well as private residential properties; it is noted, however, that due to heavy vegetation and landscaping, many hillside vantages have limited views, if any, of the project area and surrounding skyline. Since the project would not substantially obstruct views of visually prominent resources from vantages to the north, impacts would be less than significant.

(c) West-Facing Views

Similar to other nearby views of the site, project development would be visually evident but would not obstruct views of any valued visual resources. Project development would merely block views of other, more distant buildings to the west of the site. The existing sense of openness above the site would be reduced, altering the view experience from nearby vantages on streets such as Selma Way; however, valued views would not be obstructed, and views of the sky would continue to be available throughout the area. Furthermore, the juxtaposition of higher density development near existing low-rise structures pertains more to aesthetics rather than views; refer to the discussion of aesthetic impacts as it relates to the Selma-La Baig Historic District, above. As distance increases from the project site along Selma Avenue, intervening trees obscure much of the view of proposed development, and the project has less of an effect on existing views.

However, from Harold Way and La Baig Avenue, project structures would appear visually prominent at the end of the street due to their proximity. As with the other nearby vantages within the Selma-La Baig Historic District, the sense of openness above the site would be reduced and the view experience would be altered. To the extent that project development would obstruct west-facing views of the existing on-site buildings, existing views of a valued visual resource would be altered as a result of project development. The loss of these views would be considered a significant impact. Valued west-facing views of other visual resources (e.g., natural topography, natural settings, other manmade or natural features of visual interest, and resources such as mountains or the ocean) would not be significantly affected.

As seen from Sunset Boulevard, views of the Columbia Square Complex buildings and other nearby historic structures along Sunset Boulevard would continue to be available. Views of other valued visual resources in the area are not available under

existing conditions, and thus, none would be obstructed by the project. Though altered by project development, views of the open sky would continue to exist both above the site and throughout the area. Thus, view impacts from this location would be less than significant.

(d) East-Facing Views

As with other vantages in the surrounding area, other than views of various historic structures along Sunset Boulevard, which would not be affected by the project, views of valued visual resources are not available from the west under existing conditions, and thus, none would be obstructed by the project. In particular, clear views of the Selma-La Baig Historic District are not available from vantages west of the project site due to the low-rise nature of the residential properties comprising the district and intervening development and trees. As project development would not obstruct an existing view of a visually prominent resource, east-facing view impacts would be less than significant.

(3) Light/Glare

(a) Light Impacts

Lighting needed during project construction could generate light spillover to adjacent uses in the project vicinity, including the residential uses to the east across Gower Street. However, construction activities would occur primarily during daylight hours and any construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements, and would only occur for the duration needed in the finite construction process. With adherence to existing LAMC regulations, light resulting from construction activities would not significantly impact residential uses, substantially alter the character of off-site areas surrounding the construction area, or interfere with the performance of an off-site activity. Therefore, light impacts associated with construction would be less than significant.

The project would introduce new lighting on the site and, thus, would increase ambient light levels on the project site and immediate vicinity. Exterior light sources would consist of low level lighting for security, way finding, architectural, and landscaping purposes. In addition, klieg lights associated with future studio uses on the site could possibly be used on occasion. However, lighting would be directed onto the areas to be lit (e.g., building details, landscape elements, signs, and pedestrian areas) and shielded to minimize light spillover effects. Any streetlights installed along the street frontages would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties. In accordance with the Hollywood Redevelopment Plan, a lighting plan would be submitted to the Community Redevelopment Agency to ensure that project lighting would be directed and/or shielded to minimize spillage onto other properties. Project lighting would also meet all applicable LAMC lighting standards.

Interior light spillage from windows of the proposed uses would also contribute to an increase in ambient nighttime lighting levels, but such an increase would not be substantial as the project area is already characterized by medium-high nighttime lighting levels primarily due to the existing restaurant, retail, and entertainment uses throughout the Hollywood area. Overall, the project's low level lighting would not significantly increase nighttime lighting levels in the area. Therefore, the increase in ambient light would not alter the character of the area and would not interfere with nearby residential uses. Project impacts related to light would be less than significant. Furthermore, Mitigation Measures A-6 through A-8, listed below, would further ensure that specific design features would be implemented and that lighting impacts would remain less than significant.

(b) Glare Impacts

Architectural materials associated with the project would likely include materials such as glass, clay/terracotta, stainless steel, and concrete. While clay/terracotta and concrete are non-reflective, the use of glass and stainless steel or other polished surfaces could have the potential to produce glare. During late afternoons in the winter months, the project would be visible from major eastbound roadways, such as Sunset Boulevard, concurrent with the sun lowering in the southwestern horizon. This configuration has the potential to cause glare from any shiny façade materials or windows on the proposed residential tower's western façade. Reflective glare would not be expected during winter morning hours or during the other seasons of the year along Sunset Boulevard or other streets approaching the project site due to the respective positions of the sun. While acute glare conditions that hazardously interfere with driving are rare, they do occur and have the potential to exist on the western façade of the residential tower. This impact is considered potentially significant; however, implementation of Mitigation Measures A-9 and A-10 would reduce impacts to levels that are less than significant. In addition, glare reflected from parked vehicles on-site would not occur since vehicles would be parked within the enclosed structured parking facility.

(c) Shading Impacts

Winter Solstice

Shadow impacts are typically greatest during the winter months due to the sun's low position in the sky, with the resultant longer shadows stretching roughly from the northwest to the northeast during daytime hours. Project shadows during the winter would extend in a northerly direction and would move from northwest to northeast across the surrounding landscape. Throughout most of the day, these shadows would only affect commercial uses that are not considered shadow-sensitive. However, in the afternoon hours, both the proposed residential tower and the Gower Street office building would cast shadows that extend to the residential uses to the northeast and east across Gower Street. Specifically, between noon and 1:00 P.M. (approximately 12:30 P.M.), project shadows would cross into

the residential neighborhood, first affecting the buildings located on the east side of Gower Street, and then extending further east into the neighborhood throughout the remainder of the afternoon. Shadows are thus predicted to affect nearby residential uses for a maximum of 2 hours and 30 minutes. Since shadow impacts occurring during Pacific Standard Time are only considered significant if lasting for more than three hours, winter shadows generated by the project would be less than significant.

Spring Equinox

Due to the sun's higher position in the sky, cast shadows during the spring equinox are considerably shorter. As in the winter, project shadows would only affect non-sensitive commercial uses throughout most of the day. At approximately 1:30 P.M., shading from the project buildings would extend to the front of the buildings located on the east side of Gower and would continue eastward into the neighborhood during the subsequent afternoon hours. The maximum duration of shading between 9:00 A.M. and 5:00 P.M. would be three hours 30 minutes. Therefore, the project would not shade sensitive uses for more than four hours, and impacts would be less than significant.

Summer Solstice

During the summer solstice, project shadows would be the shortest and would move from west to east. However, since City guidance regarding summer shadows requires an impact analysis until 5:00 P.M., afternoon shadows cast onto the residential uses to the east would last for a longer duration of time. At approximately 2:00 P.M. (, project shadows would begin to affect the buildings on the east side of Gower Street and would continue eastward into the neighborhood during the rest of the afternoon. The maximum duration of shading between 9:00 A.M. and 5:00 P.M. would be approximately three hours. Since shadow impacts occurring from early March to early November are considered significant if lasting more than four hours, summer shadows generated by the project would be less than significant.

Fall Equinox

Morning shadows during the fall equinox would affect only commercial uses to the northwest and north. However, between 1:00 P.M. and 2:00 P.M., project shadows would reach the east side of Gower Street and affect existing shadow-sensitive residential uses. These afternoon shadows would continue to extend eastward into the residential neighborhood throughout the remainder of the day. The maximum duration of shading would be 3 hours and 30 minutes and would be experienced only by those residential structures closest to Gower Street. This impact would be less than significant.

(4) Cumulative Impacts

The project area has been undergoing a substantial transformation in recent years, and new and ongoing development in the vicinity includes dense mixed uses with mid-rise and some high-rise buildings. As indicated in Section III, Environmental Setting, of this Draft EIR, 94 related projects have been identified within the project study area. Many of these projects are located in close enough proximity to the project site so as to potentially contribute to cumulative impacts related to visual quality, views, light, glare, and shading. Such projects are highly concentrated along Vine Street between Sunset Boulevard and Franklin Avenue, and along Hollywood Boulevard between La Brea Avenue and the US-101 Freeway. Collectively, cumulative projects near the site comprise a variety of residential (apartments, condominiums, senior housing, etc.), office, hotel, retail, restaurant, and entertainment uses, consistent with existing uses in the area. While precise building designs are not yet known for much of the related development proposed in the area, based on the nature of such proposals and in light of continued population increases, it is evident that building densities are increasing in the Hollywood Community, which will likely entail general increases in the height, mass, and scale of buildings throughout the area.

(a) Aesthetics/Visual Quality

From certain perspectives, many of the related projects, once complete, could enter the same or adjacent field of view as the project. Each related project would be analyzed on a case-by-case basis to determine its impact on aesthetics and to verify compliance with applicable regulatory standards. While many of the related projects represent infill development that is not anticipated to be out of scale or character with the existing visual environment, development of the project in conjunction with several of the related projects would have the potential to contrast with the overall aesthetic image of the project area. Thus, cumulative impacts associated with aesthetic character would be significant.

Based on their location in proximity to the project site, other related projects also have the potential to result in visual contrast affecting historic resources such as the Columbia Square Complex buildings that will remain and the Selma-La Baig Historic District. Thus, cumulative visual contrast impacts would be significant.

(b) Views

The related projects have the potential to block views from local streets and other public vantages throughout the project area. The views most likely to be affected on a cumulative basis are north-facing views of the Hollywood Hills and Hollywood Sign. It is noted that many existing buildings currently obstruct views of these resources from public streets and open space areas, and such views are intermittent throughout the project area. As with the project, some of the related projects, particularly those involving mid- to high-

rise structures, may obstruct northerly views of the Hollywood Hills and Sign. However, in general these related projects would not interfere with northerly views along El Centro Avenue or Gower Street within the same fields of view potentially affected by the project structures. Furthermore, it is expected that valued views of the Hollywood Hills and Sign would continue to be available from various street segments throughout the project vicinity. However, as other related projects have the potential to affect west-facing views within the same field of view as the project site, cumulative view impacts would be significant.

(c) Light/Glare

Development of the project as well as the other related projects in the area would introduce new or expanded sources of artificial light. Consequently, ambient light levels are likely to increase in the project area. Given the location within the highly urbanized Hollywood Community, the additional artificial light sources introduced by these projects would not significantly alter the existing medium-high lighting environment that is currently created by the prominent nightlife of Hollywood. Additionally, cumulative lighting would not be expected to interfere with the performance of off-site activities given the high ambient light levels already present. Furthermore, only one of the related projects (Related Project No. 80) is sufficiently close to the project site as to cause the potential for light spillover onto the same light-sensitive properties potentially affected by the project. However, this project consists primarily of interior renovations to an existing property and is not expected to generate substantial outdoor lighting. As a result, cumulative artificial light impacts would be less than significant.

With regard to glare, it is anticipated that the related projects within the vicinity of the project site would be subject to discretionary review to ensure that building materials to be utilized would not create significant glare impacts. In addition, since the project's potential glare impacts would be eliminated through implementation of recommended mitigation, it would not contribute to any cumulative increase in glare in combination with the related project. As such, cumulative glare impacts are concluded to be less than significant.

(d) Shading

Only one related project (No. 40) is located sufficiently near the project site to potentially create cumulative shading impacts in conjunction with the project. This related project, located on Sunset Boulevard near Gower Street, features high-rise development Since shadows move in a northwesterly to northeasterly direction, the shadows of this related project would extend northwest toward the residential neighborhood immediately east of the project site during the morning hours. However, during the afternoon, such shadows would northwesterly and thus, would not overlap with project shadows. While shadows cast from this development would affect residences east of the project site, due to the location of the building, such shadows would occur during the morning hours. Therefore, cumulative shading impacts would be less than significant.

(5) Mitigation Measures

(a) Construction

The following mitigation measures are proposed to reduce construction-related aesthetic impacts to less than significant levels:

Mitigation Measure A-1: Temporary fencing with screening material shall be used around the perimeter of the project site to buffer views of construction equipment and materials.

Mitigation Measure A-2: The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

(b) Operation

The following mitigation measures are proposed to reduce aesthetic impacts associated with project operations to the extent feasible and to assure that specific design features would be implemented:

Mitigation Measure A-3: The Applicant shall prepare a street tree plan to be reviewed and approved by the City's Department of Public Works, Street Tree Division. All plantings in the public right-of-way shall be installed in accordance with the approved street tree plan.

Mitigation Measure A-4: All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the City of Los Angeles Department of Planning.

Mitigation Measure A-5: All new sidewalks along the project's street frontages shall be paved with concrete or other safe, non-slip material to create an environment accommodating to pedestrians.

Mitigation Measure A-6: All new street and pedestrian lighting required for the project within the public right-of-way shall be approved by the Bureau of Street Lighting and shall be tested in accordance with the requirements of the Bureau of Street Lighting.

Mitigation Measure A-7: All new street and pedestrian lighting required for the project shall be shielded and directed away from any off-site light-sensitive uses.

Mitigation Measure A-8: Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light spillover onto adjacent properties.

Mitigation Measure A-9: All exterior windows and glass used on building surfaces shall be non-reflective or treated with a non-reflective coating.

Mitigation Measure A-10: Architectural plans showing building surface materials, particularly on the western façade of the residential tower, shall be submitted to the Planning Department for review to ensure that specific surfacing materials and trim shall not cause roadway glare.

(6) Level of Significance After Mitigation

(a) Aesthetics/Visual Quality

During construction, temporary impacts would occur as the site's visual appearance would be degraded due to demolition and construction activities, removal of street trees, and truck traffic. The proposed mitigation measures would screen views of construction activity and help maintain a visually attractive construction site. Furthermore, the project's proposed landscaping plan would replace all removed street trees and increase overall landscaping features. Impacts after mitigation would be less than significant.

The project's proposed design and landscaping improvements would, to a large extent, enhance the visual appearance of the site. In addition, the project would be consistent with applicable goals, policies, urban design guidelines, and signage standards set forth in local requirements. However, the 14-story office building would significantly contrast in size and scale with the existing historic buildings on-site and thus, would significantly alter the historic spatial relationships. Similarly, the visual contrast introduced by the project relative to the adjacent residential neighborhood (i.e., the Selma-La Baig Historic District) would be considered a significant impact. Although substantial mitigation would be implemented to ensure a well-designed, well-maintained visual environment, such impacts would nonetheless remain significant and unavoidable.

(b) Views

Valued views of the Hollywood Hills and Hollywood Sign would not be significantly obstructed as a result of the project. However, the loss of these views from the Selma-La Baig Historic District would be considered a significant impact. As feasible mitigation

measures are not available to reduce or eliminate such impacts, view impacts would be significant and unavoidable.

(c) Light/Glare

While the project would increase light levels on-site, the increase in ambient light would not alter the character of the area and would not interfere with nearby residential uses. In addition, implementation of the proposed mitigation measures would ensure that light impacts would be less than significant.

While acute glare conditions which hazardously interfere with driving are rare, they have the potential to occur in conjunction with the proposed residential tower. However, implementation of the proposed mitigation measures, including the use of non-reflective glass or non-reflective coatings and coordination with the City Planning Department, would reduce impacts to levels that are less than significant.

(d) Shading

While project shadows would affect nearby sensitive receptors during varying portions of the day throughout the seasons of the year, impacts would be less than significant. As such, no mitigation measures would be required.

B. Air Quality

(1) Construction Impacts

(a) Regional Construction

Construction of the project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the project site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily PM and NO_x, would result from the use of construction equipment such as bulldozers, loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

In order to provide a conservative analysis, it is assumed that all construction activities would be completed in the timeframe described here. This assumption is conservative as it concentrates the construction duration such that, to the extent

reasonable, activities are occurring concurrently. The construction schedule for the project would be approximately 48 months from the start of demolition activities, commencing in 2009, to the receipt of certificates of occupancy, expected in 2013. This timeframe is of particular importance as construction emissions are directly related to the intensity of construction activities (emissions increase as the overall amount of construction activity increases). Actual construction may proceed at a less intensive pace, which would result in lower daily emissions.

Approximately 30,723 square feet of existing structures would be removed. Demolition is expected to occur during months one through six. Grading and excavation activities would occur during months seven through twelve of the project schedule, during which approximately 190,000 cubic yards of soil would be exported. Construction of the proposed structures would occur over a two-year period, representing months 13 through 36. Completion of building finishes would take one year, from month 37 to 48. Construction phases such as demolition, site preparation and building construction are not expected to overlap. Subphases such as architectural coatings and paving are included under the building construction phase.

A list of the equipment and usage rates expected to be utilized during the various phases of project construction are provided in Appendix B of this Draft EIR. It should be noted that the URBEMIS2007 model, used to calculate emission estimates, does not yet take into account recently promulgated emission standards for off-road diesel construction equipment. Thus, actual emissions from the project will likely be less than those calculated. Construction-related daily maximum regional construction emissions would not exceed the South Coast Air Quality Management District (SCAQMD) daily significance thresholds for VOC, PM_{10}, $PM_{2.5}$, CO, or SOx. However, NOx emissions would exceed the SCAQMD daily significance threshold during the site grading phase. Thus, regional construction emissions would result in a significant short-term air quality impact.

(b) Localized Construction

The conservative estimate of maximum on-site daily emissions for NO_X, PM_{10}, $PM_{2.5}$, and CO was compiled for each phase of construction and compared to the applicable screening threshold based on construction site acreage and distance to closest sensitive receptor. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided in Localized Significance Thresholds (LST) documents were used to determine localized construction emissions thresholds for the project. Maximum localized construction emissions for off-site sensitive receptors would not exceed the localized screening thresholds for NOx or CO. However, localized PM_{10} and $PM_{2.5}$ emissions would exceed the applicable screening-level LST. Thus, the localized effects from the on-site construction emissions of PM_{10} and $PM_{2.5}$ were analyzed using the ISCST3 dispersion model. The results of the dispersion modeling

predict maximum PM_{10} and $PM_{2.5}$ concentrations of 8.5 µg/m^3 and 5.5 µg/m3, respectively, would occur at the nearest residential uses (located to the west of project site). As such, PM_{10} and $PM_{2.5}$ localized impacts would remain below the SCAQMD recommended thresholds. Therefore, with respect to localized emissions from construction activities, the impacts would be less than significant.

(c) Concurrent Regional Construction and Operational Impacts

As project construction would occur over a four year period, the potential exists for concurrent construction and operational impacts. In order to identify potential emissions under this scenario, an additional analysis was conducted that takes into account concurrent construction and operational emissions (i.e., the building finishing phases could occur concurrently with the occupancy of the office and residential uses). If this scenario were to occur, the office land uses would be fully occupied and residential would be 20 percent occupied, with some construction activities (i.e., building, architectural coating [painting], and asphalt paving) still occurring during Year 2013. Retail and restaurant uses are not expected to be occupied until buildout.

Concurrent construction and operational regional emissions of CO, PM_{10}, $PM_{2.5}$, and SO_X, would be considered less than significant, since the levels of these emissions would fall below their respective SCAQMD significance thresholds. However, NOx and VOC would exceed both construction and operational thresholds. Although concurrent construction and operational activities would occur for a short duration (6-12 months), NOx and VOC emissions would result in a significant and unavoidable impact.

(d) Toxic Air Contaminants

The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. While it is anticipated that much of the site grading and excavation would be accomplished within a six-month time period, unforeseen delays could extend these activities. The California Air Resources Board (CARB) recently promulgated emission standards for off-road diesel construction equipment and off-road vehicles by requiring installation of diesel soot filters and encouraging the replacement of older, dirtier engines with newer emission controlled models. Nevertheless, construction of the project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. In addition, there would be no residual emissions after construction and corresponding individual cancer risk. As such, project-related toxic emission impacts during construction would be less than significant.

(e) Odors

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents and of diesel engines. SCAQMD Rule 1113 limits the amount of volatile organic compounds (VOCs) from architectural coatings and solvents. Compliance with this rule prevents construction materials from creating objectionable odors. In addition, due to the nature of the construction activities and the relatively small footprint of the construction site, there would be few pieces of diesel-powered equipment operating simultaneously. Therefore, construction activities would create a less than significant impact with respect to odors.

(2) Operational Impacts

(a) Regional Operations

Regional air pollutant emissions associated with project operations would come from the generation and consumption of electricity and natural gas, and by the operation of on-road vehicles. The SCAQMD classifies pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) as regional stationary source emissions. Since it is not possible to identify where electricity is produced, these emissions are conservatively considered to occur within the Basin and are regional in nature. Criteria pollutant emissions associated with the production and consumption of energy were calculated using emission factors from the SCAQMD's CEQA Air Quality Handbook.

Operational emissions are primarily a function of vehicle trips. The change in land uses and the resultant increases in trip generation were analyzed. According to the traffic report, the project would result in an increase of 9,266 daily trips over existing conditions.

Net mobile-source emissions were calculated using the URBEMIS 2007 emissions inventory model, which multiplies an estimate of the increase in daily vehicle miles traveled (VMT) by applicable EMFAC2007 emissions factors. As described in detail in Section IV.B, Air Quality, of this Draft EIR, the net increases in regional emissions resulting from operation of the project are expected to exceed the SCAQMD thresholds for VOC, NOx, CO, $PM_{10,}$ and $PM_{2.5}$. Therefore, regional operational impacts would be significant and mitigation would be required.

(b) Localized Impacts

Operation of the project does not include new industrial sources. The only substantial new stationary combustion sources identified as likely to be present during operation are boilers (hot water heater), char broilers (restaurant uses) and diesel-fired

generators for emergency power generation. Boilers are expected to operate 24-hours per day and char broilers are expected to operate 16-hours per day.

Unless a blackout occurs, the emergency diesel generators would be operated for only a few hours per month for routine testing and maintenance purposes. Compliance with SCAQMD rules regarding stationary-source combustion equipment would ensure that contributions to localized PM_{10} and $PM_{2.5}$ concentrations would remain below the 2.5 $\mu g/m^3$ operational significance threshold.

Localized NOx and CO emissions would be less than the applicable localized significance thresholds (LSTs). In addition, PM_{10} and $PM_{2.5}$ localized impacts would remain below the SCAQMD recommended thresholds. Therefore, with respect to localized on-site operational emissions the impacts for all four pollutants concerned would be less than significant.

The SCAQMD recommends an evaluation of potential localized CO impacts when a project would increase vehicle to capacity (V/C) ratios by two percent or more at intersections with a level of service (LOS) of D or worse. As indicated in Section IV.I, Transportation and Circulation, of this Draft EIR, traffic would incrementally increase with the project under future traffic scenarios, when compared to existing traffic levels, and would meet these criteria at 11 intersection locations. All 11 intersections were analyzed for 2013 build-out.

CO concentration levels at these intersections were forecasted using the CALINE4 dispersion model developed by the California Department of Transportation using peak-hour traffic volumes and conservative meteorological assumptions. CO concentrations were modeled under the future (2013) No Project and with project conditions. As described in greater detail in Section IV.B, Air Quality, of this Draft EIR, project-generated traffic volumes are forecasted to have a negligible effect on the projected 1-hour and 8-hour CO concentrations at the intersections studied. Since a significant impact would not occur at the intersections operating at the highest V/C ratio, no significant impacts would occur at any other analyzed roadway intersection as a result of project-generated traffic volumes. Thus, the project would not cause any new or exacerbate any existing CO hotspots, and, as a result, impacts related to localized mobile-source CO emissions would be less than significant.

(c) Toxic Air Contaminants

(i) Operational Impacts from TACs to Off-Site Population

The primary sources of potential air toxics associated with project operations include diesel PM_{10} from delivery trucks (e.g., truck traffic on local streets and on-site truck idling),

emergency backup generators and boilers. The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel PM_{10} (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions. CARB's Airborne Toxic Control Measure (ATCM) was adopted in 2004, which limits heavy duty diesel engines from idling for more than 5 minutes at any given time. This applies to diesel powered vehicles with gross vehicle weight ratings greater than 10,000 pounds which are licensed to operate on highways, regardless of where they are registered.

Analysis of localized air toxic impacts from TAC emissions to all nearby sensitive receptors was conducted to assess potential risk. The results of this analysis yielded a maximum off-site individual cancer risk of 9 in a million at the residences located to the south of the proposed project site. Chronic and Acute risk at this same receptor were found to be 0.004 and 0.0014, respectively. As the project would not emit carcinogenic or toxic air contaminants that result in impacts that exceed the maximum individual cancer risk of ten in one million or the chronic or acute index of 1, project-related toxic emission impacts would be less than significant.

(ii) Operational Impacts from TACs to On-Site Population

The ambient air environment that currently exists on and around the project site would also have the potential to impact the residential uses that would be developed as part of the project. Based on CARB siting recommendations, sensitive receptors should not be sited within 1,000 feet of a warehouse distribution center (which have extensive heavy-duty truck activity), within 500 feet of a freeway (or similar high traffic roadway (i.e., roads within urbanized areas carrying more than 100,000 vehicles per day)), within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater), 50 feet for typical gas dispensing facilities or within 300 feet of a dry cleaning facility that uses perchloroethylene, among other siting recommendations. Because the project does not include a distribution warehouse and is not located sufficiently proximate to the listed source types, the siting of residential uses on the project site would result in a less than significant impact with regard to the exposure of on-site residents to the TAC emission sources identified in ARB's siting recommendations (i.e., the project would not site residential uses in a high cancer risk area due to ambient air quality).

Typical sources of acutely and chronically hazardous toxic air contaminants include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. The project would not include any of these potential sources, although minimal emissions may result from the use of consumer building products for maintenance purposes (e.g. painting). As such, the project would not release substantial amounts of toxic contaminants, and no significant impacts on human health would occur. Based on the limited activity of the TAC sources, the project does not warrant the need for a health risk assessment, and potential air toxic impacts would be less than significant.

The project may include the installation and operation of diesel-fired generators for emergency power generation. Unless a blackout occurs, these generators would be operated for only a few hours per month for routine testing and maintenance purposes. The Project Applicant would be required to obtain a permit to construct and a permit to operate any standby generators under SCAQMD Rules 201, 202, and 203. Under SCAQMD Regulation XIII, all generators must meet BACT requirements to minimize emissions of PM_{10} (as well as CO, VOC, and NO_X emissions). Compliance with SCAQMD Rules and Regulations regarding stationary-source combustion equipment would ensure that contributions to localized PM_{10} concentrations remain below the 2.5 $\mu g/m^3$ significance threshold. As such, any potential impacts would be less than significant.

(d) Global Climate Change

Emissions of GHGs were calculated for the existing and projected future uses with implementation of the project. The site specific "net increase" in GHG emissions from vehicle, electrical, and natural gas usage associated with the project is approximately 0.0035 percent of the 2004 emission level. This GHG analysis was performed in accordance with existing non-GHG specific SCAQMD and CARB guidance. There are many uncertainties involved in the quantification of GHGs from any individual project.

Newer construction materials and practices, current energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago, but the net effect is difficult to quantify. Thus, the estimated net increase in emissions resulting from implementation of the project presented above may be an over- or under-estimation. These same uncertainties and assumptions exist throughout the accepted analytical methodologies for performing criteria air pollutant assessments.

Emitting GHGs into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased global accumulation of GHGs in the atmosphere that may result in global climate change. The consequences of that global climate change can cause adverse environmental effects. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is not possible to predict the specific impact, if any, to global climate change from one project's relatively small incremental increase in emissions. Thus, significance of potential impacts from GHG emissions is not apparently determined on a project-level basis, but rather on a cumulative basis (see cumulative impacts as later discussed).

(e) Odors

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass

molding. The project does not include any uses identified by the SCAQMD as being associated with odors. However, the project does include restaurant uses which have the potential to emit odors through cooking and charbroilers. The project will would minimize the release of odors from restaurant uses with odor reducing equipment as necessary. Garbage collection areas for the project would be covered and situated away from the property line and sensitive uses. Good housekeeping practices would be sufficient to prevent nuisance odors. Therefore, potential odor impacts would be less than significant.

(4) Cumulative Impacts

(a) Construction

The project would comply with SCAQMD Rule 403 requirements, and implement all feasible mitigation measures. In addition, the project would comply with adopted AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects Basin-wide, which would include each of the related projects. Nevertheless, construction-period NO_X regional emissions associated with the project are already projected to result in a significant impact to air quality. As such, cumulative impacts to air quality during project construction would also be significant and unavoidable.

Similar to the TAC emission potential of the project, the greatest potential for cumulative TAC emissions would involve diesel particulate emissions associated with heavy equipment operations during construction. Given that the project's contribution to cancer risk from construction activities would be less than significant and localized, it is reasonable to project that related projects would also not result in significant cancer risks from TAC emissions during construction, and that the areas of less-than-significant elevated cancer risks associated with construction of similar projects would not overlap to create a significant risk. Accordingly, the project's construction phase TAC emissions would not contribute to a cumulatively significant impact.

Also similar to the project's impacts, potential sources from the related projects that may emit odors during construction activities at each related project would include the use of architectural coatings and solvents, and emissions from diesel-powered construction equipment. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Via mandatory compliance with this rule, it is anticipated that construction activities or materials used in the construction of the related projects would not create objectionable odors. In addition, due to the nature of the construction activities and the relatively small footprints of the various construction sites,

there would be few pieces of diesel-powered equipment operating simultaneously. Thus, odor impacts from construction of the related projects are anticipated to be less than significant individually, as well as cumulatively in conjunction with the project.

(b) Operation

Based on optional SCAQMD methodology, as outlined in the *CEQA Air Quality Handbook*, a project would have a significant cumulative air quality impact if, for either population or employment, the ratio of VMT induced by the project to anticipated countywide VMT exceeds the ratio of project-related employee or population to anticipated countywide population or employment. The project's VMT ratio does not exceed the employee or population ratio. Thus, development of the project would have a less than significant cumulative air quality impact. In addition, as previously shown, localized CO impact analyses conducted for cumulative traffic (i.e., related projects and ambient growth for Year 2013) demonstrate no local CO violations would occur at any of the studied intersections. As such, the regional emissions that would occur as a result of the project would not be cumulatively considerable.

The proposed project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products, landscape maintenance activities, among other things. As mentioned previously, the project is not expected to include gasoline dispensing land uses. Natural gas fired boilers may be installed as part of the project. Boilers installed would be required to comply with SCAQMD Rule 1146 which limits pollutant emissions from small and large boilers. Pursuant to California Assembly Bill 1807, which directs the CARB to identify substances such as TAC and adopt airborne toxic control measures (ATCMs) to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the project would not result in any sources of TACs that have been identified by Land Use Guidelines, and thus, would not contribute to a cumulative impact.

The project and related projects may require the installation of additional back-up diesel powered emergency generators. All new generators would be required to comply with all applicable rules and regulations. If the installation of new generators results in multiple-generator groups, the installation would also be required to comply with recently promulgated Rule 1472 to ensure that localized risk remains below thresholds. Compliance with Rule 1472, if applicable, would constrain potential impacts. In addition, unless a blackout occurs, these generators would be operated for only a few hours per month for routine testing and maintenance purposes. Emergency generators are operated for far shorter time periods, and their TAC emissions are localized. Therefore, even

cumulatively, their emissions are highly unlikely to trigger any risk thresholds of concern. As such, cumulative risk impacts of TAC exposure from emergency generators would be less than significant.

With respect to potential odor impacts, neither the project nor any of the related projects (which are primarily office, residential, retail, and restaurant uses) have a high potential to generate odor impacts. Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement Best Available Control Technology to limit potential objectionable odor impacts to a less than significant level. Thus, potential odor impacts from related projects are anticipated to be less than significant individually and cumulatively.

(c) Global Climate Change

The State, with AB 32, has mandated a goal of reducing state-wide emissions to 1990 levels by 2020, even though State-wide population and commerce is predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce Statewide GHG emissions. However, currently there are no significance thresholds, no official baseline inventory or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative level. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represents new emissions or existing, displaced emissions. Assembly Bill 1493 mandates that CARB create GHG emission reduction rules for cars and light trucks. The new rules are proposed to go into effect in 2009 and will be fully implemented by 2016. According to the CEC, the reductions in emissions will be equivalent to reducing gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020. The project is slated for occupancy after these regulations go into effect and therefore a percentage of the cars used by residents of the project will emit lower levels of GHG from VMT than cars currently on the road. New power plant emission standards are proposed and anticipated to go into effect as a result of both the *LA Green Plan* and AB 32. The anticipated emission reductions are not taken into account for this project, and future Equivalent carbon dioxide (CO2e) emission factors would be reduced when these measures go into effect. When the rules are fully implemented and older cars are replaced with AB 1493 compliant vehicles there will be further reduction in GHGs from trips to and from the project.

The following planned City actions, as presented in the *LA Green Plan*, when implemented, may further decrease emissions of GHGs from the project:

- Decreasing emissions from Department of Water and Power electrical generation and import activities;

- Providing compact fluorescent light (CFL) bulbs to encourage acceptance and use of CFLs; and

- Expanding the regional rail network to reduce VMT.

In addition, the project is designed with a number of features which are consistent with the following City of Los Angeles goals:

- Increasing the use of energy efficient appliances and equipment;

- Promoting high-density housing close to mass transportation; and

- Creating walkable neighborhoods.

Governor Schwarzenegger's Executive Order S-3-05 established GHG emissions targets for the state through the year 2050, a date beyond AB 32's mandates. As a result of the executive order, the California Climate Action Team (CAT), led by the Secretary of the California EPA, was formed. The CAT published its report in March 2006, in which it laid out several recommendations and strategies for reducing GHG emissions and reaching the targets established in the executive order. Section IV.B, Air Quality, of this Draft EIR, illustrates the project's consistency with those recommendations and strategies presented in the CAT report. The recommendations apply directly to CAT strategies for reducing GHG emissions and are applied as project mitigation measures below.

While it is difficult at this time to quantify the reductions in greenhouse gas emissions anticipated from the above-listed statewide and citywide measures, the project would be consistent with the goals of the State of California and City of Los Angeles. By incorporating energy and VMT reducing features and mitigation measures such as designing, constructing, and operating the project to obtain LEED® Silver certification, installing appliances, fixtures, and infrastructure that use less energy and water, and by locating housing near to mass transit and employment centers, the project will result in lower GHG emission rates compared to current standards and practices. As such, the contribution to the cumulative impact of global climate change after mitigation is considered less than significant.

(5) Mitigation Measures

The following mitigation measures are (1) intended to implement requirements of SCAQMD Rule 403 (Fugitive Dust) and (2) set forth a program of air pollution control strategies designed to reduce the project's air quality impacts to the extent feasible during construction.

(a) Construction

Mitigation Measure B-1: General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.[3]

Mitigation Measure B-2: All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. This mitigation measure would reduce all criteria pollutant emissions during construction.

Mitigation Measure B-3: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. This mitigation measure would reduce all criteria pollutant emissions during construction.

Mitigation Measure B-4: Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts. This mitigation measure would reduce all criteria pollutant emissions during construction.

Mitigation Measure B-5: Electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible. This mitigation measure would reduce all criteria pollutant emissions during construction.

Mitigation Measure B-6: All construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site. This mitigation measure would reduce all criteria pollutant emissions during construction

Mitigation Measure B-7: The Project Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations, in particular Rule 1113 (Architectural Coatings). This mitigation measure would reduce VOC emissions during construction.

Mitigation Measure B-8: The Project Applicant shall moisten soil not more than 15 minutes prior to moving soil or conduct whatever watering is necessary to prevent visible dust emissions from exceeding 100 feet

[3] *SCAQMD Rule 403 requirements are detailed in Appendix C.*

in any direction. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction

Mitigation Measure B-9: The Project Applicant shall apply non-toxic chemical stabilizers according to manufacturer's specifications to disturbed surface areas (completed grading areas) within five days of completing grading or apply non-toxic dust suppressants or vegetation sufficient to maintain a stabilized surface. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-10: Exposed pits (i.e., gravel, soil dirt) with 5% or greater silt content shall be watered twice daily, enclosed, covered, or treated with non-toxic soil stabilizers according to manufacturer's specifications. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-11: The Project Applicant shall water excavated soil and debris piles hourly or cover them with tarp, plastic sheets or other coverings. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-12: Water exposed surfaces at least twice a day under calm conditions. Water as often as needed on windy days when winds are less than 25 miles per hour or during very dry weather in order to maintain a surface crust and prevent the release of visible emissions from the construction site. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-13: All trucks hauling dirt, sand, soil or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the material and the top of the truck). Wash mud-covered tires and under-carriages of trucks leaving construction sites. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-14: Sweep adjacent streets, as needed, to remove dirt dropped by construction vehicles or mud that would otherwise be carried off by trucks departing the site. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-15: Securely cover loads with a tight fitting tarp on any truck leaving the construction site. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-16: Cease grading during periods when winds exceed 25 miles per hour. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-17: Cease grading during second stage smog alerts. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-18: Building walls shall be watered prior to use of demolition equipment. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

(b) Operation

Mitigation Measure B-19: The Project Applicant shall, as feasible, schedule deliveries during off-peak traffic periods to encourage the reduction of trips during the most congested periods. This mitigation measure would reduce all criteria pollutant emissions during operation.

Mitigation Measure B-20: The Project Applicant shall, to the extent reasonably feasible, install energy-efficient appliances (e.g., ENERGY STAR) to reduce energy consumption. This mitigation measure would reduce all criteria pollutant emissions during operation.

(c) GHG Emissions

Mitigation Measure B-21: The Project Applicant shall provide landscaping to include planting several trees that are most conductive to sequestering carbon while remaining drought resistant. Native plants shall be used for landscaping to the extent reasonably feasible.

Mitigation Measure B-22: The project shall reduce its domestic water demand by at least 30 percent through the use of low-water or high-efficiency fixtures, including toilets, urinals, showers, and faucets.

Mitigation Measure B-23: The Project Applicant shall, provide preferred parking to alternative-fuel vehicles and ride-sharing vehicles as reasonably feasible. Upgraded bus waiting areas shall be constructed. Bicycle storage areas for residents, customers and employees biking to work shall be provided.

(6) Level of Significance After Mitigation

(a) Construction

Implementation of the mitigation measures described above would reduce construction emissions for all pollutants. With implementation of feasible mitigation measures, maximum daily NOx emissions during site grading and excavation activities would be reduced to approximately 148 pounds per day. However, construction NOx emissions would continue to exceed the SCAQMD regional significance thresholds for NOx during the mass site grading phase. As such, project construction would continue to result in a significant regional impact and cumulative construction impact even with incorporation of all feasible mitigation measures.

No significant impacts related to TAC emissions during construction are anticipated to occur for the project. As such, potential TAC impacts would be less than significant.

The project is not anticipated to generate a substantial amount of objectionable odor emissions during construction. Via mandatory compliance with SCAQMD Rule 1113, no construction activities or materials are proposed that would create objectionable odors. As such, potential odor impacts would be less than significant.

(b) Operation

Although the project would incorporate numerous project design features to reduce operational emissions as well as mixed use design, and is designed to meet the criteria for LEED® Silver designation, regional operational emissions would still exceed the SCAQMD daily emission thresholds for VOC, NOx, CO PM_{10} and $PM_{2.5}$ after implementation of the mitigation measures. Therefore, operation of the project would have a significant and unavoidable impact on regional air quality. Because the impact of operating the project by itself would be significant, the cumulative operational impact of the project and related projects would also be significant.

C. Cultural Resources

(1) Historic Resources

As described in detail in the Historic Resources Technical Report (Appendix C of this EIR), the Columbia Square Complex is significant under criterion A of the National Register of Historic Places for its association with the development of radio and television as major industries in the United States and under criterion C as an excellent example of International Style architecture in Los Angeles and a representative work of master architect William Lescaze. Columbia Square may also be significant under Criterion B for

its association with significant people. In addition, the Columbia Square Complex is eligible for listing in the California Register under Criterion 1 for its association with the development of radio and television in the United States and under Criterion 3 as an excellent example of International Style architecture in Los Angeles and as an example of renown New York architect William Lescaze. Columbia Square may also be significant under Criterion 2 for its association with William Paley, the founder and former chairman of CBS, D.W. Thornburgh, vice-president of CBS until 1949, and countless entertainment figures in the radio, television and recording industries who worked at Columbia Square, including Jack Benny, Bing Crosby, Ed Wynn, Lucille Ball, Art Linkletter, Tommy Dorsey, Miles Davis, Janis Joplin, and Bob Dylan. The Columbia Square complex was also approved as a Historic-Cultural Monument by the City of Los Angeles as the building was determined to embody the distinguishing characteristics of international Style architecture, the building is associated with master architect William Lescaze, the property is associated with the development of radio and television broadcasting in Hollywood, and the property is identified with several prominent figures of the entertainment industry of Hollywood. Thus, the Complex is considered an historic resource under CEQA.

The project proposes to retain three of the four buildings and the Sunset Courtyard which comprise the Columbia Square Complex. The Radio Building, Studio A, the Commercial/Television Building, and the Sunset Courtyard would be rehabilitated according to the Secretary of the Interior Standards for Rehabilitation. The functionality of the rehabilitated structures would be integrated with that of the other structures proposed on-site, and extensive landscaping, open space, and pedestrian links would be introduced to connect and integrate all elements of the project. To this end, the project has been designed to acknowledge the history of the site while building on it for the future. The fourth building, which houses Studio B/C, would be removed and replaced by a 14-story office building. The northern portion of the site would be developed with a seven-story hotel building and residential structures ranging from eight to forty stories.

As discussed in detail in the Historic Resources Technical Report, the Radio Building, Studio A, the Commercial/Television Building, and the Sunset Courtyard would be rehabilitated in accordance with the Secretary of the Interior's Standards. The rehabilitation program would be based on original drawings, historic photographs, and existing conditions, and identified character-defining features on both the interior and exterior would be retained. Thus, in accordance with CEQA, significant impacts associated with proposed rehabilitation of existing structures would not occur.

As discussed in detail in the Historic Resources Technical Report, Studio B/C is a physical manifestation of the development of the site for increased radio and television production. Thus, removal of Studio B/C would impact the Complex's ability to convey its historic development. In addition, the proposed removal of Studio B/C does not conform to the Secretary of Interior's Standards and would result in a significant impact that cannot be

mitigated. It should be noted that while the removal of Studio B/C is significant, the remaining portions of the Complex would continue to be eligible for listing in the National Register of Historic Places and the California Register of Historic Places because the remaining portions of the Complex convey both their historic associations in terms of use, and their architectural associations with William Lescaze. The Historic Resources Technical Report indicates that numerous design elements have been proposed as part of the project that would provide references to Lescaze's International Style design used within the Complex. However, the Historic Resources Technical Report determined that the contemporary design of various project components and introduction of new materials contrast instead of complement the existing historic buildings. In addition, it was determined that significant impacts would occur due to the following: the massing of the proposed residential and office buildings introduces a new massing element to the horizontal nature of the existing buildings on the site; the size and scale of the new office tower would significantly alter the historic spatial relationships and the experience of the Complex from its public spaces; and the location of the office tower would have a significant impact on the site as viewed from Sunset Boulevard and Gower Street, and due to its adjacency to the Commercial/Television Building. While the residential tower would be located at the rear of the property, the new building would alter the existing relationship of the historic buildings to the street with the introduction of prominent vertical massing. The Historic Resources Technical Report also determined that the size, scale, and massing of the proposed project would also significantly impact existing historic resources adjacent to the project site, including the Selma-La Baig Historic District, and adjacent historic resources along the Sunset corridor.

(2) Archaeological Resources

With regard to archaeological resources, given the lack of reported finds in the vicinity and disturbance of the ground surface over time, archaeological sensitivity of the project site is considered to be low. In addition, given the construction history of the project site and known levels of fill, shallow or surficial archaeological resources that may have existed on the project site have likely been destroyed. If, however, a unique archaeological resource were discovered during construction of the project, work in the area would cease and deposits would be treated in accordance with Federal and State regulatory requirements, including those set forth in California Public Resources Code Section 21083.2. Impacts to archaeological resources would be less than significant.

Results of the cultural resource records search through the CHRIS-SCCIC, and the Sacred Lands Search through the NAHC revealed that there are no known burials or Native American cultural resources within the Project site or within a half-mile radius of the Project site. If such resources are encountered during construction excavation and/or grading activities, all work shall cease in that area. Any discovery of human remains will be treated in accordance with Section 5097.98 of the Public Resources Code (PRC) and Section 7050.5 of the Health and Safety Code. With implementation of Mitigation Measure

C-8, below, potential impacts related to archaeological resources would be reduced to a less than significant level.

(3) Paleontological Resources

With regard to paleontological resources, the project site is underlain by Pleistocene-age sediments, although any paleontological resources that may have existed at the surface at one time have likely been disturbed by past development activities. Therefore, the uppermost sediments are not likely to contain fossils. During deeper excavations, such as those associated with construction of the subterranean levels of the parking facility, there is a potential that fossil vertebrate materials may be encountered in the deeper Pleistocene-age sediments. If such resources were encountered during excavation and grading activities, all work would cease in that area. Any discovery of paleontological resources would be treated in accordance with City guidelines for identification, evaluation, disclosure, avoidance or recover, and curation, as appropriate. With implementation of Mitigation Measure C-9, below, potential impacts related to paleontological resources would be reduced to a less than significant level.

(4) Cumulative Impacts

The residential neighborhood immediately east and northeast of the project, located between Gower and Gordon Streets and Carlton Way and Sunset Boulevard, contains a number of structures that are contributors to a historic district known as the Selma-La Baig Historic District. A few related projects are located in close enough proximity to the project site (Related Projects Nos. 91, 92, 97, and 98) so as to potentially contribute to cumulative impacts to the adjacent Carlton/Harold Way/Selma/La Baig neighborhoods. As such, the project in combination with related projects may result in a significant cumulative historic impact to the adjacent Selma-La Baig Historic District.

In addition to the Selma-La Baig Historic District, the greater project area is known for a number of historic resources, notably the Hollywood Boulevard Commercial and Entertainment Historic District and the Hollywood Walk of Fame. The Hollywood Historic Commercial and Entertainment Historic District is listed on the National Register and contains 57 contributing features; the Walk of Fame extends along Hollywood between Sycamore Avenue and Gower Street as well as along Vine Street between Yucca Street and Sunset Boulevard.[4] Additional resources in the vicinity include the Hollywood Palladium, Warner Brothers Studio, and the Earl Carroll Theater. Such resources add to

[4] *Community Redevelopment Agency of the City of Los Angeles, Hollywood Redevelopment Plan Amendment Final EIR, February 2003.*

the general character of the area and contribute to its historical context associated with the entertainment industry in Hollywood.

As indicated in Section III, General Description of Environmental Setting, of this Draft EIR, 94 related projects have been identified within the project study area. As shown in Figure III-1 in Section III, General Description of Environmental Setting, many related projects are located in close proximity to the project site including many that are highly concentrated along Vine Street between Sunset Boulevard and Franklin Avenue, and along Hollywood Boulevard between La Brea Avenue and the 101 Freeway. Collectively, the cumulative projects near the site propose a variety of residential (apartments, condominiums, senior housing, etc.), office, hotel, retail, restaurant, and entertainment uses, consistent with existing uses in the area. Some of these related projects impact (directly or indirectly) identified historic resources in Hollywood, including those indicated above. These related projects can be further reduced to those relevant projects that impact a resource of like character (based on use, context, building type, and evaluation/significance) to the project such as Related Project No. 94 (the Capitol Records Tower project located adjacent to the Hollywood Boulevard District) located at 1750 Vine Street, and Related Project No. 36 (the Hollywood & Vine Mixed Use Project adjacent to the Hollywood Boulevard District with a proposed high-rise office building, within sight of project site) located at 6250 Hollywood Boulevard. In addition, Related Project No. 93 is foreseeable to the north of the historic Hollywood Palladium venue, directly west of the project site.

As described above, the characteristic configuration, spatial relationships and setting of the Columbia Square Complex would be altered and a substantial amount of historic fabric would be adversely affected with the demolition of Studio B/C as proposed by the project. In addition, the design, size, scale, and massing of proposed new development would significantly alter the historic relationships with the Columbia Square Complex and nearby historic resources. Thus, in accordance with CEQA, implementation of the project would result in a significant impact to historic resources that cannot be mitigated. Accordingly, the project's impact to historic resources in combination with anticipated impacts to Hollywood entertainment industry-related historic resources that would occur with implementation of the related projects would result in a significant unavoidable adverse impact to historic resources. Therefore, the project's significant unavoidable historic impact in combination with historic impacts generated by related projects would result in a significant cumulative historic impact.

With regard to potential cumulative impacts related to archeological and paleontological resources, the project vicinity is located within an urbanized area that has been substantially disrupted over time. In the event that such resources are uncovered, each related project would need to comply with regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that

mitigation measures would be established as necessary to address the potential for uncovering of paleontological resources and archeological resources.

(5) Mitigation Measures

The project, as proposed, constitutes a significant adverse change in a historic resource. Demolition of a portion of the Columbia Square Complex (Studio B/C) cannot be mitigated to a level of insignificance. In addition, the location, design, size, scale and massing of new development would significantly alter the historic relationships with the Columbia Square Complex and nearby historic resources. However, the following mitigation measures would reduce impacts on historic resources:

Mitigation Measure C-1: A Historic Structures Report (HSR) shall be prepared which includes all the components of the CBS Columbia Square complex. The HSR shall provide complete documentary, graphic, and physical information about both the property's history and its existing condition. In addition, the report shall include appropriate methods for treatment of the existing historic fabric, outlines a recommended scope of work, and provides information and recommendations for further treatment. This report should be prepared according to the National Park Services Preservation Brief 43: The Preparation and Use of Historic Structures Reports.[5]

Mitigation Measure C-2: The Complex should be photographed to the Historic American Building Survey (HABS) level 1 standards prior to any demolition, abatement or rehabilitation work. Copies of the documentation should be given to Hollywood Heritage and the Los Angeles Public Library. Existing condition and/or measured drawings shall be included.

Mitigation Measure C-3: The rehabilitation of the remaining portions of the Columbia Square Complex shall follow the Secretary of the Interior's Standards and have specifications for the treatment of character-defining features as identified in the HSR contained in the general specifications for the project. The specifications would include (but are not limited to), sections for treatment of historic fabric; quality control; substitution procedures; demolition; selective removal and storage of historic materials; protection, patching, and cleaning; and determination of repair options and potential replacement of severely

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[5] *U.S. Department of the Interior, National Park Service. "Preservation Brief 43: The Preparation and Use of Historic Structures Reports," 2005. http://www.nps.gov/history/hps/tps/briefs/brief43.htm*

deteriorated features. Materials conservation plans shall be incorporated into the plans and specifications if necessary.

Mitigation Measure C-4: All original character-defining features on the exterior of the Lescaze-designed components shall be retained and rehabilitated according to the Secretary of the Interior's Standards in order to ensure that all remaining historic fabric is appropriately treated and returned to its original appearance wherever possible.

. **Mitigation Measure C-5:** Structural engineers with expertise in historic preservation shall provide a shoring design solution, if necessary, to protect the Columbia Square Complex from construction procedures and mitigate the possibility of settlement due to the removal of adjacent soil. Structural engineers shall also evaluate the potential impacts of the proposed subterranean parking adjacent to the historic foundations. Temporary seismic movement during new construction shall also be analyzed, and recommendations to allow for this movement shall be provided. This plan shall be part of the HSR and reviewed and approved by the City of Los Angeles Office of Historic Resources.

Mitigation Measure C-6: The project team shall include a historic preservation professional who shall be responsible for construction monitoring. This professional shall meet the National Park Service standards for a qualified historic architect.[6]

Mitigation Measure C-7: An interpretive program involving photographic exhibits and other educational media shall be developed to chronicle the history of the site, its architects, technological innovations, and uses. These materials shall be placed in the historic buildings on-site, and made accessible to the public.

Mitigation Measure C-8: If a unique archaeological resource was discovered during project construction activities, work in the area would cease and deposits would be treated in accordance with Federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. In addition, if it is determined that an archaeological site is a historical resource, the provisions of Section 21084.1 of the Public Resources Code and CEQA Guidelines Section 15064.5 would be implemented.

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[6] *U.S. Department of the Interior, National Park Service. "Archeology and Historic Preservation: Secretary of the Interior's Professional Qualifications Standards."* http://www.nps.gov/history/local-law/arch_stnds_9.htm

Mitigation Measure C-9: A qualified paleontologist shall be retained by the Applicant to perform inspections of excavation or grading activity in sediments five feet or more below the original ground surface. The frequency of inspections shall be based on consultation with the paleontologist and will depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If fossils are found during monitoring, the paleontologist shall prepare a report summarizing the results of the monitoring program including methods of fossil recovery and curation, and a description of the fossils collected and their significance. A copy of the report shall be provided to the Applicant and to the City of Los Angeles. The fossils and a copy of the report will be deposited in an accredited curation facility.

(6) Level of Significance After Mitigation

The project as proposed would include the rehabilitation of the Radio Building, Studio A, the Commercial/Television Building, and the Sunset Courtyard in accordance with the Secretary of the Interior's Standards. Thus, impacts associated with rehabilitation of these resources would be less than significant.

The demolition of Studio B/C would not conform to the Secretary of Interior Standards and would result in a significant impact. Removal of Studio B/C could also constitute a significant adverse change to the historic resource due to its size, spatial relationship to the complex, and function. In addition, as described above, the design, location, size, scale and massing of new development within the site would significantly alter the historic relationships with the Columbia Square Complex and nearby historic resources. While the proposed mitigation measures would reduce impacts on historic resources, such impacts would remain significant and unavoidable. In accordance with CEQA, demolition of a portion of the Complex cannot be mitigated to a level of insignificance. As described in detail in Section V., Alternatives of this Draft EIR, mitigation measures to reduce these significant impacts were considered and were determined to be infeasible.

With compliance with regulatory requirements and the mitigation measures provided above, impacts associated with archeological and paleontological resources would be less than significant

D. Hazards and Hazardous Materials

(1) Operation

An auto repair facility was located on the northern portion of the project site from approximately the late 1930s to at least the 1950s. In June 2006, a subsurface assessment was conducted on the project site to determine if soil contamination had occurred from this former use. The samples were analyzed for total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and metals. TPH and lead contamination were found on-site, which are likely from the former auto repair facility. Because this portion of the project site is proposed to be redeveloped with residential uses, the soil contamination may present a concern to future residents. Therefore, Mitigation Measure D-1 below is recommended to reduce potential impacts from soil contamination to a less than significant level.

Fluorescent light ballasts are located within the buildings occupied by television and radio station operations. It is possible that they contain poly-chlorinated biphenyls (PCBs). Implementation of the project could result in generation of PCB wastes during demolition and renovation activities. However, potential impacts from PCB-containing fluorescent light ballasts would be reduced to a less than significant level with the incorporation of Mitigation Measure D-2 below.

A 6000-gallon diesel underground storage tank (UST) is located immediately north of the generator building near the southwest corner of the project site. According to containment tightness test reports, there is a leak within the secondary containment of the UST. The leak is likely from a failed rubber boot or penetration leak within the secondary containment piping. No evidence of a fuel release is evident to date. Prior to project building construction, this UST would be removed. Soil contamination may exist below the UST and associated piping. Therefore, Mitigation Measure D-3 below is proposed to reduce potential impacts from the UST and associated soil contamination to a less than significant level.

Because all the existing buildings located on the project site were constructed prior to 1980, it is likely that asbestos is present in some of the building materials (i.e., floor tiles and mastic, ceiling tiles, and piping insulation wrap). Furthermore, signs stating the presence of asbestos were observed in the buildings occupied by television and radio station operations. The project proposes to demolish and/or renovate the existing buildings located on the project site. The demolition and/or renovation of these buildings would have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or removed prior to demolition or renovation activities. The removal of asbestos is regulated by SCAQMD Rule 1403 and therefore would be removed by a certified asbestos containment contractor in accordance with applicable regulations prior to

demolition or renovation. Therefore, with implementation of Mitigation Measure D-4 below, impacts related to asbestos would be reduced to a less than significant level.

Due to the time frame in which the existing buildings located on the project site were constructed, it is possible that lead-based paint is present. No lead-based paint sampling has been conducted at the project site. Since the project proposes to demolish and/or renovate the existing buildings located on the project site, the potential for lead exposure exists. However, with the implementation of Mitigation Measure D-5 below, potential impacts from lead exposure would be reduced to a less than significant level.

The project site is not located within a City-designated methane zone or methane buffer zone. Furthermore, according to Division of Oil, Gas, and Geothermal Resources (DOGGR) records, no oil wells are located directly on the project site. Therefore, no impacts with regard to methane gas are anticipated to occur.

Federal Aviation Regulations (FAR) Part 77, Objects Affecting Navigable Airspace, establishes minimum standards to ensure air safety by regulating the construction or alteration of buildings or structures that may affect airport operations. The Federal Aviation Administration (FAA) requires that Form 7460-1, Notice of Proposed Construction or Alteration be filed with the FAA regional office prior to construction for buildings that are 200 feet or greater in height from the grading terrain. In addition, generally any structure that exceeds an overall height of 200 feet above ground level (AGL) should be marked and/or lighted. However, the determination is made by FAA and depends on terrain features, weather patterns, geographic location, number of structures, and overall layout of design. The Project Applicant would file the appropriate forms subject to the approval of the FAA to ensure that the project would not result in significant impacts relative to airport safety.

(2) Cumulative Impacts

All related development located within the vicinity of the project site would be subject to the same local, regional, State, and Federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the simultaneous development of the project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

(3) Mitigation Measures

Mitigation Measure D-1: Prior to issuance of a grading permit, the Project Applicant shall hire a qualified environmental consultant to excavate and dispose of contaminated soils, or treat in-situ (in place), in accordance with applicable regulatory requirements and approved by

applicable governmental authorities. If during grading activities additional contamination is discovered, grading within such an area shall be temporarily halted and redirected around the area until the appropriate evaluation and remediation measures are implemented in accordance with applicable regulatory requirements so as to render the area suitable for grading activities to resume.

Mitigation Measure D-2: Prior to demolition and/or renovation activities, all fluorescent light ballasts shall be inspected for PCBs. Any PCB-containing fluorescent light ballasts shall be disposed of in accordance with applicable regulatory requirements and approved by applicable governmental authorities.

Mitigation Measure D-3: During removal of the 6,000-gallon diesel UST, soil sampling shall be conducted below and in the immediate vicinity of the UST and associated piping. The Project Applicant shall submit the results of the soil survey to the City of Los Angeles Department of Building and Safety. If soil contamination is found, it shall be removed or remediated in accordance with applicable regulatory requirements.

Mitigation Measure D-4: Prior to issuance of demolition permits, the Project Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that an asbestos survey has been conducted at all existing buildings located on the project site. If asbestos is found, the Project Applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule 1403.

Mitigation Measure D-5: Prior to issuance of demolition permits, the Project Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that a lead-based paint survey has been conducted at all existing buildings located on the project site. If lead-based paint is found, the Project Applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint.

(4) Level of Significance After Mitigation

Potentially significant impacts associated with hazards and hazardous materials would be less than significant with implementation of the aforementioned mitigation measures.

E. Hydrology and Water Quality

(1) Construction

Construction of the project would involve site preparation activities including demolition, excavation, and grading. Such activities would temporarily alter the existing drainage patterns and water flows within the project site. During construction, approximately 190,000 cubic yards of soil would be excavated and exported. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as the construction site would be greater than one acre, the project would be required to file a Notice of Intent and obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Construction Activity Permit (Order No. 99-08-DWQ). In accordance with the requirements of the permit, the project would prepare and implement a site-specific Stormwater Pollution Prevention Plan (SWPPP), which would specify Best Management Practices (BMPs) and erosion control measures to be used during construction to minimize pollution in runoff. BMPs would include but not be limited to proper scheduling to avoid mass grading during the rainy season; covering materials such as bags of cement, paint, etc.; designating wash pits for washing paint, stucco, etc.; berming the site to control effluent from leaving a site during a rain event; and establishing sediment traps. These and other BMPs would eliminate or reduce pollutant levels in runoff during construction activities. In addition, the project would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City grading regulations, construction-related impacts to hydrology and water quality would be less than significant.

(2) Operation

The project would result in a net increase in pervious surfaces due to the introduction of new landscaped areas throughout the project site. Specifically, after project implementation, pervious surfaces would constitute approximately 21 percent of the site. Moreover, the distribution of flows as well as on-site drainage systems would be slightly altered. Existing on-site drains would be modified or abandoned, and new drains (e.g., cast iron pipe, area drains, roof drains, etc.) would be installed. After buildout of the project, the drainage area for the project site would continue to comprise 6.49 acres but this area would be divided into five subareas (B1 through B5). The estimated post-project runoff rate at the project site would be approximately 11.14 cubic feet per second (cfs) during a 10-year storm event and 17.69 cfs during a 50-year storm event. The runoff rate during a 10-year storm event would be approximately 0.72 cfs less than the existing runoff rate. The runoff rate during a 50-year storm event would be approximately 1.16 cfs less than the existing runoff rate. Such decreases in runoff rates, which would occur as a result

of the project's decrease in impervious surface area (due to the introduction of new landscaped areas), would reduce runoff quantities to the local storm drains serving the site, thus allowing for additional capacity within the drainage system. Furthermore, the project's stormdrain system would be designed such that post-development flow rates at each drainage point would not exceed the pre-development flow rates. Therefore, impacts to the existing storm drain system would be less than significant.

As is typical of most major urban developments, stormwater runoff from the project site has the potential to contribute oil and grease, suspended solids, metals, gasoline, pesticides, and pathogens to the stormwater conveyance system. The project would be required to prepare a SUSMP which would specify operational BMPs to be implemented. Operational BMPs would be designed to infiltrate and filtrate the first 0.75 inches of on-site stormwater runoff in accordance with City requirements. In addition, as part of the SUSMP, any outdoor trash storage areas would be designed to direct drainage around the walled or screened off enclosure preventing any off-site transport of trash and pollutants. Lastly, an Operations and Maintenance Plan (OMP) would be developed for each water quality design feature to be implemented by the project. The OMP would specify the water quality design feature and the party responsible for each of the maintenance routines. The OMP would also require a log be kept on-site to record the details of the maintenance routines including 1) the type of maintenance activities or source-control practices, 2) the date the activities were completed, and 3) the name of the operator performing the activities.

With compliance with NPDES and City requirements addressing stormwater runoff, impacts associated with water quality would be less than significant.

(3) Cumulative Impacts

As identified in Section III of this EIR, there are 94 related projects in the project vicinity. These projects could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff, resulting in cumulative impacts to hydrology and water quality. However, as with the project, the related projects would be subject to State NPDES permit requirements for both construction and operation. Each related project would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to water quality. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Furthermore, as the project would result in a decrease in stormwater runoff flows, the project could potentially have a beneficial effect relative to the capacity of the local storm drain system available to serve related development in the area. Thus, cumulative impacts to hydrology and water quality would be less than significant.

(4) Mitigation Measures

While the project would not result in significant impacts with regard to hydrology and water quality, the following mitigation measures are recommended to further reduce impacts:

(a) Construction

Mitigation Measure E-1: All wastes from construction of the project shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.

Mitigation Measure E-2: Leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

Mitigation Measure E-3: Material spills shall not be hosed down at the pavement. Dry cleanup methods shall be used wherever possible.

Mitigation Measure E-4: Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or cover with tarps or plastic sheeting.

Mitigation Measure E-5: Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets.

Mitigation Measure E-6: All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills.

Mitigation Measure E-7: A Stormwater Pollution Prevention Plan shall be prepared by a California licensed civil engineer or licensed architect, to the satisfaction of the Stormwater Management Division of the Bureau of Sanitation that shall include the following:

- Identification of the sources of sediments and other pollutants that affect the quality of storm water discharge;

- A monitoring program and reporting plan for the construction period.

- The Storm Water Pollution Prevention Plan shall be retained at the construction site.

(b) Operation

Mitigation Measure E-8: The project shall prepare a Standard Urban Stormwater Mitigation Plan (SUSMP), which shall meet the most recent requirements of the City of Los Angeles and Los Angeles Regional Water Quality Control Board. The SUSMP shall outline specific Best Management Practices (BMPs) to be implemented on the site. Recommended BMPs for the project would include one or a combination of the following stormwater mitigation systems for the first 0.75 inch of rainfall:

- Dry wells and/or infiltration trenches in the proposed courtyards or beneath the foundations of the proposed project buildings to infiltrate stormwater runoff into the native soils.

- Infiltration planters (constructed with a large section of porous stone) on the open space areas of the podium level or the ground level courtyards to infiltrate stormwater runoff. Infiltrated runoff would be piped from the planters down into the native soils. Dry wells and/or infiltration trenches would still be needed to properly convey the runoff into the native soils at a smaller scale.

- Collection tanks to store and reuse stormwater runoff for building/irrigation graywater networks. Stormwater runoff from the rooftops would be captured and stored into these tanks throughout the project site. This runoff could be used on-site for irrigation.

The infiltration systems shall include a by-pass system to capture and convey the runoff to the municipal storm drain system. In addition, pollutants would be removed from the stormwater runoff by the infiltration planter areas and mechanical filter units such as downspout filters.

(5) Level of Significance After Mitigation

Impacts to hydrology and water quality would be less than significant. Furthermore, mitigation measures are proposed to further reduce impacts.

F. Land Use

(1) Consistency with Local Plans and Applicable Policies

The project would be substantially consistent with the goals, objectives and policies of the General Plan Framework including those set forth in the Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, and Transportation Chapters. To summarize, the project would support the General Plan Framework of the General Plan as it would assist in improving "the jobs and housing relationships in sub-areas of the City through the re-use of commercially zoned corridors and development [near] transit stations which afford the opportunity for the development of a mix of uses, housing, local retail, and offices, and can improve localized jobs and housing relationships." The project's mixed-use development would provide a supply of housing in close proximity to jobs and services, which would support the Land Use Chapter's objective to provide for the stability and enhancement of multi-family residential neighborhoods and to encourage the development of commercial uses and structures that integrate housing units with commercial uses. The project also supports the goal to intensify residential developments, as the City "has insufficient vacant property to accommodate the cumulative amount of population growth which has been forecasted." In addition, the project would be compatible with several of the General Plan Framework's objectives and policies regarding the development of mixed-use projects and locating residents near alternative transportation facilities. Lastly, the project would also provide an employment population for the surrounding dense urban area.

The Hollywood Community Plan designates the site for Commercial Manufacturing. Pursuant to LAMC Section 11.5.6, the Project Applicant seeks a General Plan Amendment to amend the adopted Hollywood Community Plan's land use designation for the project site from the current Commercial Manufacturing industrial land use designation to the Regional Center commercial land use designation. Granting the requested General Plan Amendment is considered desirable since the proposed designation would be consistent with the zoning and other designations for the project site. In addition, the proposed land use designation would be compatible with the designation of many of the properties in the surrounding area, especially those along Sunset Boulevard. The proposed General Plan Amendment would permit a greater floor area ratio (FAR) in order to allow a mixed-use project with commercial and residential components at the proposed density.

The project would be substantially consistent with the policies of the Hollywood Community Plan. A key objective of the Hollywood Community Plan is the provision of housing to satisfy the varying needs and desires of all economic segments of the community. The General Plan Amendment would allow a greater FAR and encourage mixed-use development, which would support this objective by providing much needed housing in conjunction with community-service retail/restaurant uses and other employment

generating land uses. It is further noted that while the project site's land use designation would be changed from Commercial Manufacturing Industrial to Regional Center, to the extent that entertainment-related studio uses would be provided for, the project would retain the types of uses currently permitted and present on-site.

The project site is also located in the area referred to in the Community Plan as the Hollywood Center. This area is intended to serve as a commercial and entertainment center for Hollywood and beyond, and mixed residential/commercial developments are specifically encouraged. With the proposed mix of land uses, including office and community-serving retail/restaurant uses combined with residential uses, the project would support and promote the Hollywood Center as the focal point of the community. The project would also foster community revitalization by renovating several potentially historic buildings and developing an underutilized site with more suitable uses that are compatible with the adjacent commercial and residential neighborhoods. The location of the project would also be advantageous to future residents given the proximity to significant regional employment centers such as Hollywood, Beverly Hills, and downtown Los Angeles via a number of transit options. Overall, based on the discussion above, the project would be generally consistent with the objectives and policies set forth in the Hollywood Community Plan.

The project would be generally consistent with the applicable policies contained in the Transportation Element of the General Plan. It would enhance pedestrian circulation and promote direct pedestrian linkages between transit portals/platforms and adjacent commercial development through facilities orientation and design, encourage increased use of public transit by virtue of its location on a major transit corridor (Sunset Boulevard) and near several multi-modal transportation hubs, and provide a mix of uses that would allow people to accomplish multiple activities in the area. In addition, the project would eliminate or minimize the intrusion of traffic generated by new regional or local development into residential neighborhoods while preserving an adequate collector street system. Direct access to the commercial and residential uses on-site would be provided via Selma Avenue, El Centro Avenue, and Gower Street, the latter two of which connect to Sunset and Hollywood Boulevards. Travel on nearby residential collector streets would not be necessary to access the project site, and the locations and design of these access points would minimize intrusion of traffic into the residential neighborhood to the east of the project site. The project also would be consistent with the Land Use/Transportation Policy (Appendix F of the Transportation Element), which serves as guidance for future development occurring in transit station areas. The project would develop a mix of residential and commercial uses on an existing site that is easily accessible to transit services thereby fostering use of transit and reducing automobile trips.

The project would meet many of the housing goals and policies contained in the Housing Element of the General Plan. The requested General Plan Amendment and Zone

Change would allow for the development of a large supply of housing in close proximity to commercial activities and employment centers. In addition to the commercial component, which would include community-serving retail and restaurant uses as well as jobs-generating hotel and office uses, the project would add 400 residential units to a commercial corridor in need of additional quality housing without removing any existing housing. The project would also accommodate various residential needs by providing a mix of various sized units. The project would also enhance the public streets by improving adjacent streetscapes and creating a pedestrian-friendly, landscaped environment.

With approval of the requested actions, the project would be in compliance with LAMC requirements. If granted, these approvals will provide the Project Applicant an opportunity to enhance the project site with a variety of amenities and services that cater to the surrounding community, while providing new job opportunities. The site and surrounding area are located in a portion of the City that is undergoing a significant transition. In particular, many new developments, including other high-density mixed-use projects, are occurring within the surrounding community, revitalizing the Hollywood Center and showing evidence of being a lively, pedestrian-oriented area with a variety of residential, commercial, retail, bar/restaurant and professional office uses, among others. The project would support and promote this transition.

The project would be consistent with the overall provisions and goals of the Hollywood Redevelopment Plan. The project would provide substantial open space, including two public courtyards, a pocket park, and two recreation areas for resident/guest use, collectively totaling approximately 76,400 square feet and representing approximately 40 percent of the overall project site area. Additionally, the project would involve the renovation and re-use of several buildings historically associated with the entertainment industry, which has thrived in the area. While the project would implement mitigation such as restriping, signalization, operational improvements, additional lanes, etc. to address traffic and circulation impacts resulting from the proposed development, traffic and circulation impacts would remain significant and unavoidable. Therefore, findings shall be prepared and a statement of overriding considerations shall be adopted. As such, the required findings can be made by the Community Redevelopment Agency City of Los Angeles (CRA) in order to approve a FAR in excess of 4.5:1. In summary, with approval of the requested discretionary actions, the project would be consistent with the goals and provisions of the Hollywood Redevelopment Plan.

Implementation of the project would help revitalize the project area by creating an economically viable mixed-use development on an underutilized site. Thus, the project would be consistent with the City's intent for the Los Angeles EZ.

(2) Consistency with Regional Plans and Applicable Policies

The project would be substantially consistent with the goals/policies set forth in the SCAG Regional Comprehensive Plan and Guide, Regional Transportation Plan, and Growth Vision Report. As discussed in Section IV.B, Air Quality, of this Draft EIR, the project would be consistent with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan. In addition, as discussed in Section IV.I, Transportation and Circulation, of this Draft EIR, implementation of the project would not conflict with the CMP as it would not exceed CMP thresholds at any CMP intersection or freeway monitoring location.

(3) Land Use Compatibility

Project impacts related to land use compatibility would be less than significant. The land uses proposed as part of the project would serve the surrounding employment base and residential neighborhoods and would contribute to the vitality of the area. In particular, the project would provide community-serving retail, restaurant, and office uses while introducing new housing within the Hollywood area. The proposed residential uses in proximity to commercial uses would both promote the job/housing balance and serve to retain commercial, and specifically entertainment-related, employment. The project's commercial component would be compatible with existing commercial uses along Sunset Boulevard, while the proposed residential uses would be consistent with the multi-family residential uses immediately east of the site. The project would also foster community revitalization by renovating existing historic buildings on the site and developing an underutilized site with more suitable uses that are compatible with the adjacent commercial and residential neighborhoods.

Relative to the location of the proposed hotel use in proximity to residentially zoned properties, only a few low and medium density residential buildings are located within 500 feet of the site, to the east of Gower Street. The project would be buffered from these off-site residential uses by existing commercial uses fronting the east side of Gower. Moreover, the hotel would be oriented towards El Centro Avenue (i.e., to the west) and surrounded by compatible commercial uses and parking areas located off-site. The proposed hotel would be consistent with redevelopment efforts ongoing in the surrounding area, including other hotel development, intended to retain and promote Hollywood as a tourist destination.

The proposed studio uses would also be proper in relation to surrounding development given their location within Hollywood, the historic center of the entertainment industry. Nearby off-site uses include Sunset/Gower Studios across Sunset Boulevard to the southeast, Raleigh Studios on Melrose Avenue to the south, and Paramount Studios also on Melrose. Moreover, the project site is currently developed with studio uses.

Additionally, supporting uses for film and television studios, such as post-production facilities and wardrobe services, are located throughout the area. Maintaining the ability to utilize the project site for studios would support the other studio uses in the area and be consistent with local agency goals for the area.

The project design reflects a transition in building height with regard to the neighborhood's character. The transitional heights of the project would maintain the existing low-rise buildings in the southern portion of the site, permit mid- to high-rise buildings throughout the central and northern portions of the site, and concentrate the tallest component of the project in the northwest corner of the site, furthest from Sunset Boulevard and existing off-site residential uses to the east. This vertical vernacular would provide a transition between the surrounding commercial and more distant residential uses while allowing for a higher density development within the site. The project would also be designed to provide substantial and striking visual interests since all of the buildings vary in height, bulk and massing, thus creating an identity that is distinctive yet compatible with surrounding uses.

The design of the proposed improvements would improve and enhance the visual character of the site, be aesthetically compatible with surrounding uses, and generally improve the identity of the site and the Sunset Boulevard commercial corridor. The project would incorporate design elements with an architectural theme that complements the existing character of the area. Additionally, the project would incorporate attractive lighting, for purposes of providing security and aesthetic enhancements, while also being sensitive to nearby properties. Moreover, the project would be designed to be non-intrusive on adjacent uses with enclosed loading facilities, interior trash collection, and hidden interior parking. As demonstrated throughout this analysis, the project would not disrupt, divide, or isolate any existing neighborhoods or communities.

Since construction activities can also be a source of compatibility issues, construction is also addressed herein. Construction of the project would result in temporary significant impacts associated with air quality and noise. However, these impacts would be short-term in nature and would be staged to minimize disruption to neighboring streets and properties. Please refer to Section IV.B, Air Quality, and Section IV.G, Noise, of this Draft EIR for further discussion.

(4) Cumulative Impacts

As with the project, the related projects would be required to comply with relevant land use policies and regulations. Therefore, as the project would generally be consistent with applicable land use plans, the project would not incrementally contribute to cumulative inconsistencies with respect to land use plans. Cumulative impacts on the regulatory framework would be less than significant.

There are numerous related projects located within a few blocks of the project site, including apartments, condominiums, office buildings, hotels, restaurants/cocktail lounges, and retail uses, as well as mixed-use developments incorporating some or all of these elements. As discussed previously, the project vicinity is undergoing a significant transition as the City's residential population continues to increase. Major developments are underway, effecting a widespread revitalization of the area and renovation of older structures, and much needed housing is being introduced. Further, with the renaissance of the Hollywood business district, the area is attracting more visitors, thus requiring adequate new amenities. The project would be compatible with the various developments planned throughout the surrounding vicinity, as well as with existing uses in the immediate area. While the project in combination with the related projects represents a continuing trend of infill development at increased densities, they also will serve to modernize the area and provide sufficient infrastructure and amenities to serve the growing population. Such related projects are not expected to fundamentally alter the existing land use relationships in the community, but rather would concentrate development on particular sites and promote a synergy between existing and new uses. As such, the project would not contribute to a cumulative impact with respect to land use compatibility.

(5) Mitigation Measures

With incorporation of the project design features and approval of the proposed discretionary permits and requests, the project would generally be consistent with existing regulatory requirements and relevant land use policies. In addition, the project would not disrupt or divide an established community. Thus, no mitigation measures are required.

(6) Level of Significance After Mitigation

Impacts related to land use would be less than significant, and no mitigation measures would be required.

G. Noise

(1) Construction Noise

Noise from construction activities would be generated by vehicles and equipment involved during various stages of construction operations, including demolition, site clearing and grading, and building construction. The noise levels created by construction equipment will vary depending on factors such as the type of equipment, the specific model, the operation being performed and the condition of the equipment. Construction noise associated with the project was analyzed using a mix of typical construction equipment, estimated durations and construction phasing. Noise levels at nearby noise

sensitive receptors (residential uses) were estimated, and a comparison with the noise impact criteria was conducted. The estimated noise levels represent a worst case scenario because construction activities are analyzed as if they were occurring along the perimeter of the construction area, whereas, construction will actually typically occur in a limited area and at a further distance. In addition, the noise sensitive receptors that are located further from the construction site would experience less construction noise as sound diminishes away from the source and due to intervening buildings between the source and receiver.

Estimated noise levels from construction activities would exceed the project significance thresholds (5 dBA above the ambient noise level) at two identified sensitive receptor locations, as well as at the existing Hollywood Palladium event venue. The highest noise levels would occur during the site demolition, which would last approximately four to six months. During this period, the ambient noise levels would increase by about 17 dBA periodically when the heavy construction equipment operates near the project boundary, which would result in a significant on-site construction noise impact. Based on a site visit, the Hollywood Palladium does not have outdoor uses which could be impacted by the construction noise. However, construction activities could result in a significant impact during performances within the interior of the Hollywood Palladium.

In addition, the Hollywood Palladium project, a proposed mixed-use development with residential uses on the west side of El Centro Avenue across from the project site, could be impacted by construction-related noise impacts should it be approved, completed and occupied prior to project construction commencement. However, it is anticipated that the estimated construction noise levels would be consistent with existing ambient noise levels, therefore, construction noise impacts are expected to be less than significant at the proposed residential uses.

In addition to the on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the project site throughout the project's construction period. Major noise sources would be haul trucks and delivery trucks. While construction workers would arrive from various directions, haul trucks and delivery trucks would generally access the site via El Centro Avenue and/or Gower Street and via Sunset Boulevard to the regional freeway system (i.e., Highway 101 or Interstate 10). The residential uses on Selma Avenue and Harold Way just east of Gower Street would have partial direct line-of-sight to the truck route. Approximately 190,000 cubic yards of soils would be exported during site excavation, which would require 120 truck trips per day. Based on an 8-hour workday, there would be approximately 15 truck trips on an hourly basis. It is estimated that the residences near Gower Street would be exposed to a noise level of approximately 62 dBA (hourly L_{eq}) due to project haul trucks, which is consistent with the existing daytime ambient noise environment of 62 to 67 dBA. The estimated noise level due to haul truck movements would not exceed the project significance threshold. Therefore, significant noise impacts would not be expected from off-site construction traffic.

(2) Construction Vibration

With regard to the project, the highest level of ground-borne vibration would be generated primarily during site grading and foundation activities (e.g., installing piles). The off-site structures located nearest the construction site are commercial buildings just north and west of the project site on the north side of Selma Avenue and the west side of El Centro Avenue, which are located approximately 50 feet from the closest edge of the construction site. In addition, the proposed Hollywood Palladium Project is located approximately 70 feet from the construction site. These off-site commercial buildings would likely experience ground vibration levels (PPV) of up to 0.032 inch-per-second and 0.02 inch-per-second PPV, respectively, during the site grading/excavation (while using major construction equipment such as large bulldozer, drilling for placement of piles and loaded trucks). The closest off-site residences, located east of the project site along Harold Way and Selma Avenue, would likely be exposed to ground vibration levels of up to 0.017 inch-per-second PPV during the construction period when heavy equipment is used (i.e., site grading/excavation). Vibration levels are below the 0.5 inch-per-second and 2.0 inch-per-second PPV significance thresholds for residential structures and commercial buildings, respectively. Therefore, vibration impacts associated with construction would be less than significant and no mitigation measures are required.

(3) Operations Noise

With respect to project impacts to neighboring noise-sensitive receptor locations, project-specific noise sources considered herein include off-site roadway noise, on-site mechanical equipment, loading and parking facilities, and outdoor entertainment facilities (i.e., restaurant outdoor dining areas and pool areas).

(a) Off-Site Roadway Noise

Potential noise impacts due to project-related off-site traffic were analyzed by estimating the increase in noise levels assumed with traffic volumes and comparative noise levels with existing conditions. With respect to project-related traffic increases, the relationship between the change in noise levels and the change in traffic volumes is logarithmic. Thus, a doubling in traffic volumes would result in an increase in noise levels of 3 dBA. The largest project-related and cumulative traffic-related noise impact is anticipated to occur along the segment of Selma Avenue, between Argyle Avenue and Gower Street. Project-related traffic would add 2.4 dBA CNEL to this roadway segment, while related project plus ambient growth traffic volumes are expected to add an additional 0.3 dBA CNEL to this roadway segment, for a combined total of 2.7 dBA CNEL. As the incremental increases in noise levels at all other analyzed locations are less than 2.7 dBA CNEL, and these noise level increases are less than the more conservative 53-dBA CNEL significance threshold, project roadway noise impacts are considered to be less than significant.

(b) On-site Stationary Noise

(i) Mechanical Equipment

The project would require mechanical equipment to condition and ventilate the indoor air environment. Such equipment generally consists of air handling units, condenser fans, exhaust fans (for buildings and parking structures) and emergency generators and are intended to support the function of the proposed structures. Project design features, including enclosure or screen/parapet walls, would ensure that noise levels from such equipment would comply with the City of Los Angeles Noise Ordinance requirements, (i.e., maximum 5 dBA above the ambient noise levels). Thus, impacts associated with mechanical equipment would be less than significant.

(ii) Loading Dock

The project would include a loading dock at the northwest portion of the project site, with access from Selma Avenue. The loading dock would be located in an enclosed parking structure and would not have any unobstructed openings that face toward any noise sensitive receptor. Delivery trucks would access the loading docks from Selma Avenue. Loading/unloading activities would generate a noise level of approximately 74 dBA L_{eq} at a reference distance of 25 feet for brief durations.

The nearest residential uses are located on Selma Avenue, east of the project site, and approximately 350 feet from the loading dock. The residential tower of the proposed Hollywood Palladium project is anticipated to be located approximately 400 feet from the loading dock. However, these residential units are shielded from the loading docks by the presence of existing intervening building structures. Accounting for distance attenuation and the acoustical shielding provided by intervening building structures, the loading dock activities noise level at the nearest residential uses would be approximately 40 dBA $L_{eq,}$ which is well below the existing ambient noise level of 55 dBA (measured at sensitive receptor location R2). Therefore, loading dock related noise levels would not result in significant noise impacts. As such, impacts would be less than significant, and no mitigation measures would be required.

(iii) Parking Facility Noise Levels

The project includes a nine-level parking facility that includes six above ground levels and three subterranean parking levels. The parking facility would be accessed from El Centro Avenue, Selma Avenue and Gower Avenue. Various noise events would periodically occur from the parking facilities including: activation of car alarms, sounding of car horns, slamming of car doors and tire squeals. Automobile movements would comprise the most continuous noise source and would generate a noise level of approximately 65 dBA at a distance of 25 feet. Car alarm and horn noise events would generate maximum noise levels of as high as 69 dBA at a reference distance of 50 feet. The parking

facility would be fully enclosed with the upper levels of the parking facility being surrounded by the new building structures, thus providing effective noise shielding to the nearby residential homes to the east of the project site. Thus, noise from the new, fully enclosed parking structure at the nearby residential homes is expected to be less than that in the existing noise environment, which includes an open parking lot. Therefore, the new subterranean and the enclosed parking structures would not be expected to have noise impacts on any noise-sensitive receptor location. As such, impacts would be less than significant, and no mitigation measures are required.

(iv) Outdoor Entertainment Facilities

The project would include a restaurant located at the southwest portion of the project site (along El Centro Avenue). Potential noise associated with the proposed restaurant operation would include music at the outdoor dining area. The closest off-site residential receptors to the outdoor dining area are approximately 450 feet to the east (along Harold Way east of Gower Street) and 600 feet to the southwest. The off-site residential uses would be shielded from the outdoor dining area by the existing and future buildings. In order to adhere to the City's Noise Regulation, the outdoor amplified music planned for the outdoor area at the proposed restaurant would have a noise limit of approximately 90 dBA at a distance of 50 feet from the center of the activities.

In addition, the project would include two outdoor pool facilities to be located near the site's core area above the podium level (approximately 64 feet above street level). Noise from the pool areas would be shielded to the sensitive receptors by project's buildings residential, office and hotel buildings. Thereby, outdoor related noises from pool areas would be effectively mitigated to the level of insignificant.

(v) Emergency Rooftop Helipad Noise Levels

The project would include a helipad on the roof of each of the two new high-rise buildings. Use of the helipad would be for emergency purposes only. Thus, based on the infrequent and emergency nature of such a use, adverse noise impacts related to helipad uses would be less than significant.

(c) Composite Noise Level Impacts from Project Operations

An evaluation of noise from all project sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum project-related noise level increase that may occur at the noise-sensitive receptor locations. The overall sound environment at the areas surrounding the project comprises contributions from each individual noise source associated with the typical daily operation of the project. Primary noise sources associated with the project would include traffic, mechanical equipment, parking facility, loading dock/refuse collection, and outdoor entertainment uses. Based on

a review of the noise-sensitive receptors and the project's noise sources, the only noise-sensitive locations wherein composite noise impacts could occur are the residential uses east of Gower Street. Due to a combination of distance and the presence of intervening structures that would serve as noise barriers, the only project noise source that could potentially affect the other noise-sensitive locations included in this analysis is roadway noise.

The project-related traffic is expected to increase the traffic-related noise by a maximum of 0.6 dBA (CNEL) along Gower Street, between Santa Monica Boulevard and Sunset Boulevard. Project-related mechanical equipment would be shielded to all noise sensitive receptors through project design features and would be designed to meet the City's Noise Ordinance (maximum of 5 dBA above the lowest ambient noise levels or City's presumed ambient noise levels). The lowest ambient noise levels are more than 10 dBA lower than the 24-hour CNEL levels. Therefore, project mechanical-related noise in terms of CNEL would be approximately 10 dBA below the overall ambient noise levels. The proposed parking facility would provide an effective noise attenuation as it would be enclosed. Parking facility-related noise at the nearest receptors are estimated to be more than 10 dBA below the existing CNEL level. Therefore parking related noises would be insignificant. The loading docks and refuse collections would be located in the subterranean parking level, which will not have any unobstructed openings that face toward any noise-sensitive receptor location. Therefore, noise associated with the loading docks and refuse collection transference to the outside would be negligible and would not increase the overall ambient noise levels.

In summary, at the residential uses east of Gower Street, the project-related traffic is expected to increase the ambient noise by a maximum of 0.6 dBA (CNEL). The mechanical and parking facility related noise are expected to be minimum 10 dBA below the existing ambient noise level, which will have a contribution of less than 1.0 dBA to the composite noise level. Overall, relative to the existing noise environment, the project is estimated to increase the ambient sound level at the nearest noise sensitive receptors by less than 2 dBA (CNEL). Composite noise impacts at all other receptors are expected to be less than 1 dBA (CNEL). As such, the composite noise level impact due to the project would be less than significant.

(d) Land-use Compatibility (Proposed Residential and Hotel Uses)

The noise environment that currently exists surrounding the project site would also affect the project's proposed on-site residential and hotel uses. The project's proposed residential and hotel uses are proposed at the northern portion of the project site and primarily facing Gower Street, Selma Avenue, and El Centro Avenue. The project site is currently exposed to noise levels up to 69 CNEL, due primarily to traffic on adjacent roadways. Currently, the baseline ambient noise level at times exceeds the City-

recommended noise standard used for multi-family residential and hotel developments (65 dBA CNEL) for the site. Therefore, noise insulation features should be included in the design of the residential and hotel buildings, to reduce the exterior noise level to 45 dBA (CNEL) at the interior of the buildings. Incorporation of the mitigation measures below would reduce potential impacts associated with the introduction of residential and hotel uses to a less than significant level.

(e) Ground-Borne Vibration from Project Operations

The project would include typical residential and commercial-grade stationary mechanical equipment such as air-conditioning (HVAC) and exhaust fans, which would produce vibration. However, the vibration generated by the mechanical equipment is typically negligible at off-site receptors as they are normally mounted on anti-vibration devices (vibration isolators) and are located within the building. The primary sources of transient vibration would include passenger vehicle circulation within the proposed subterranean parking facility, on-site refuse/delivery truck activity, and on-site loading dock/refuse collection area activity. The nearest off-site structures to the project are commercial and residential buildings located approximately 50 feet away, which would experience ground-borne vibration of 0.001 inch per second. The potential vibration impacts from all project sources at the closest structure locations would be less than the significance threshold of 0.01 inch per second. As such, vibration impacts associated with operation of the project would be less than significant and no mitigation measures would be required.

(4) Cumulative Impacts

Of the 94 related projects, there are three related projects situated approximately 70 to 500 feet from the project site, including Related Project No. 60 – 42 unit residential development at Carlton Way just east of Gower Street, Related project No. 40 – an office project at Sunset Boulevard and Gower Street, and No. 93 – Hollywood Palladium project at Sunset Boulevard and Argyle Avenue. The potential for noise impacts to occur are specific to the location of each related project as well as the cumulative traffic on the surrounding roadway network.

(a) Construction Noise and Vibration

Noise from on-site construction activities would only affect areas less than 500 feet from the construction site. As described above there are three related projects within 500 feet of the project site. Short-term cumulative impacts could occur at noise sensitive receptors located between the project and the three noted related projects. In addition, short-term cumulative impacts could occur at noise sensitive receptors where trucks from the project and related projects are using the same roadways that have adjacent sensitive uses. Thus, even with proposed mitigation measures, if nearby related projects were to be

constructed concurrently with the project, significant and unavoidable cumulative construction noise impacts could result.

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the project, there is no potential for a cumulative construction- or operational-period impact with respect to ground-borne vibration.

(b) Long-Term Operations

With regard to long-term operations, the project site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from a number of community noise sources including vehicle travel, mechanical equipment (e.g., HVAC systems), and lawn maintenance activities. Each of the related projects that have been identified within the general project vicinity would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations.

All related projects are of a residential, retail, commercial, or institutional nature, and these uses are not typically associated with excessive exterior noise; however, each project would produce traffic volumes that would generate roadway noise. Cumulative traffic volumes would result in a maximum increase of 2.7 dBA CNEL along the segment of Selma Avenue, between Argyle Avenue and Gower Street. As this noise level increase would be below the more conservative 3 dBA CNEL significance threshold, roadway noise impacts due to cumulative traffic volumes would be less than significant.

Due to LAMC provisions that limit stationary-source noise from items such as roof-top mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project. For this reason, on-site noise produced by any related project would not be additive to project-related noise levels. As the project's composite stationary-source impacts would be less than significant, composite stationary-source noise impacts attributable to cumulative development would also be less than significant.

(5) Mitigation Measures

(a) Construction

Noise associated with on-site construction activity would have the potential to result in a significant impact at nearby sensitive uses (including the Hollywood Palladium and residential uses). Therefore, the following feasible mitigation measures are recommended to minimize and reduce construction-related noise impacts.

Mitigation Measure G-1: Exterior noise generating construction activities shall be limited to Monday through Friday from 7:00 A.M. to 9:00 P.M., and from 8:00 A.M. to 6:00 P.M. on Saturdays. No construction activities shall occur on Sundays or any national holidays.

Mitigation Measure G-2: Effective temporary noise barriers, when they are feasible, shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptors (residential uses on Selma Avenue and Harold Way).

Mitigation Measure G-3: Noise-generating construction equipment operated at the project site shall be equipped with effective noise control devices (i.e., mufflers, lagging, and/or motor enclosures). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

Mitigation Measure G-4: Contractor shall coordinate with the Hollywood Palladium manager when noisy construction activities occur, such as during site demolition and excavation, to avoid conflicts with operations of the Hollywood Palladium (i.e. during performance events).

Mitigation Measure G-5: During project construction, impact pile driving shall not be permitted for the installation of soldier piles.

(b) Operations

Mitigation Measure G-6: The outdoor amplified sound system for the restaurant outdoor dining and the outdoor pool areas shall be limited to a maximum sound level of 90 dBA at 50 feet.

Mitigation Measure G-7: An acoustical analysis of the architectural plans of the proposed residential and hotel building shall be prepared by a qualified acoustical engineer, prior to issuance of building permits, to ensure that the building construction (i.e., exterior wall, window and door) will provide adequate sound insulation to meet the acceptable interior noise level of 45 dBA CNEL, as required by the City's building code.

(6) Level of Significance After Mitigation

(a) Construction

Mitigation Measure G-1 would preclude construction-period noise impacts from occurring during the noise-sensitive night-time periods, or at any time on Sundays.

Implementation of Mitigation Measure G-2 would provide 5 to 10 dB noise reduction, when the noise barriers break the line-of-sight between the construction equipment and the receivers. Noise level reductions attributable to Mitigation Measures G-3 and G-4, although not easily quantifiable, would ensure the noise level impact associated with construction activities minimized to the extent practicable. Thus, project construction activities would intermittently increase the daytime noise levels at the noise sensitive receptors during the site demolition and initial stages of site grading/excavation activities by more than the 5 dBA significance threshold. As such, noise impacts during construction are concluded to be significant and unavoidable.

(b) Operation

The project would not result in any significant noise impacts to off-site noise sensitive receptors during long-term project operations. Implementation of Mitigation Measure G-6 would ensure that the outdoor entertainment uses meet the City's noise regulations at the nearby sensitive receptors. Implementation of Mitigation Measure G-7 would ensure the interior of the proposed residential units meets the 45 dBA (CNEL) requirement. As such, operational noise impacts would be less than significant.

H. Public Services

(1) Fire Protection

(a) Construction

Construction activities may temporarily increase the existing demand on fire protection and emergency medical services. Construction activities could potentially expose combustible materials such as wood, plastics, sawdust, coverings and coatings to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Project construction would also comply with applicable codes and ordinances relating to fire safety practices. Therefore, construction impacts on fire protection and emergency medical services would be less than significant.

Short-term construction activities such as lane closures, sidewalk closures, and utility line construction could have implications related to response time for emergency vehicles due to access obstruction. Construction activities would also generate traffic

associated with the movement of construction equipment, hauling of demolition and graded materials, and employee traffic. As such, construction activities could increase response time for emergency vehicles on Sunset Boulevard due to travel time delays caused by traffic. However, during construction, traffic management personnel (flag persons) would be employed as necessary to ensure access is maintained to the project site and that traffic flow is maintained on street right-of-ways. Furthermore, appropriate detour signage would be employed as necessary to ensure emergency access is maintained to the project site and that traffic flow is maintained on street right-of-ways. Emergency access to the site would remain clear and unobstructed during construction of the project; therefore, impacts related to LAFD emergency access would be less than significant.

(b) Operation

The project site is located within the "first-in" district boundaries of Fire Station No. 27. Project implementation could increase the demand on LAFD services. Based on a factor of 0.26 incidents per capita for Fire Station No. 27, the residential component of the project would generate approximately 236 additional incidents per year, which would increase the total annual response by 1.70 percent. The commercial components of the project also would result in approximately 1,727 employees on the site. Furthermore, in addition to the permanent increase in residents and employees attributable to the project, development would result in an increase in visitors associated with the hotel and commercial uses at the site. This temporary daytime population could also generate responses. Thus, project implementation could increase the demand on LAFD services. However, Fire Station No. 27 is located just over one-half mile from the project site, which is within the recommended maximum response distance (1.5 miles), and has an estimated response time of 3.5 minutes to the project site. Therefore, impacts relative to the LAFD's capability to provide adequate fire protection services would be less than significant. In addition, Fire Station No. 82 and 42 would also be available to serve the project site in event of emergencies. Furthermore, the project would submit a plot plan for approval by the LAFD either prior to the recordation of the final map or the approval of a building permit. To ensure that such impacts would remain less than significant, mitigation measures are proposed.

The project Applicant would submit a plot plan for approval by the LAFD either prior to the recordation of the final map or the approval of a building permit. Additionally, the project would comply with applicable Fire and Building Codes, and LAFD requirements and would have a less than significant impact relative to fire safety design, access, and fire flow. Nonetheless, mitigation measures are proposed to ensure compliance with Fire Code and LAFD requirements.

(c) Cumulative Impacts

Of the 94 related projects listed in Section III. of this Draft EIR, 32 are located within the "first-in" fire district boundaries of Fire Station No. 27. These related projects, in conjunction with the project, would cumulatively generate the need for additional fire protection and emergency medical services. Based on the generation factor of 0.26 incidents per capita, the project in conjunction with the related projects would generate approximately 2,066 additional incidents per year. The related projects would also have an increase of commercial/retail and office uses, which would increase the daytime population of the area and increase the demand on LAFD services. All related projects would be required to comply with the LAMC Fire Code and Building Code regulations related to fire safety, access, and fire flow. In addition, it is anticipated that related projects would be subject to discretionary review by the LAFD and would be required to implement mitigation measures to ensure that no significant impacts to fire protection services would occur. Furthermore, other nearby fire stations, including Fire Stations No. 82 and 41 would be available to provide backup support to Fire Station No. 27 if necessary in the event of an emergency. Therefore, the project combined with related projects would result in a less than significant cumulative impact relative to fire protection and EMS services.

(d) Mitigation Measures

The following recommendations of the Fire Department would ensure compliance with the City's requirements and ensure that any impacts associated with fire protection would remain less than significant.

Mitigation Measure H-1: The Project Applicant shall submit building plans including a plot plan for approval by the Los Angeles Fire Department prior to the recordation of the final map.

Mitigation Measure H-2: The Project Applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features appropriate to the design of the project.

(e) Level of Significance After Mitigation

The project would not result in significant impacts on fire protection and emergency medical services. Implementation of the proposed mitigation measures would ensure compliance with Fire Code and LAFD requirements. Thus, no significant impacts are anticipated with respect to fire services.

(2) Police Protection

(a) Construction

Short-term construction activities, including but not limited to lane closures, sidewalk closures, and utility line construction, could potentially affect emergency police access to the project site. Construction activities would also generate traffic associated with the movement of construction equipment, hauling of demolition and graded materials, and employee traffic. However, traffic management personnel (flag persons) would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate detour signage would also be used as necessary to ensure emergency access would be maintained to the project site and that traffic flow would be maintained on street right-of-ways. In addition, the LAPD would be notified of the days, times, and locations of any lane closures. As construction traffic could significantly affect emergency response times for the area, a Construction Staging and Traffic Management Plan would be implemented with coordination between the project's construction managers and the LAPD (refer to Mitigation Measure I-1 in Section IV.I, Transportation and Circulation). Therefore, with the implementation of the Construction Staging and Traffic Management Plan and coordination with the LAPD, potential project impacts due to construction activities would be reduced to a less than significant level.

(b) Operation

The residential population of the project (908 residents) would potentially generate approximately 30 crimes per year. In addition, the project's commercial uses would generate a non-residential population of 1,831 persons, which would also potentially generate crimes. However, no crime rate for non-residential uses is available; therefore, crimes associated with the project's commercial uses could not be quantified.

As the project would generate approximately 908 new residents, the residential population for the Hollywood Community Police Station's service area would increase to a total of approximately 231,291 residents. Based on this new population, the officer per resident ratio in the Hollywood Community Police Station service area would be reduced from 1 officer per 648 residents to 1 officer per 701 residents. This change in officer per resident ratio, which is less than one percent, would not be significant.

In a correspondence letter dated October 23, 2008, the LAPD indicated that the project's size could have a significant impact on police services and, therefore, recommended that crime prevention features be incorporated as part of the project. As such, the project would include proposed security features (i.e., provision of on-site security guards, controlled parking and building access, and closed circuit television (CCTV) cameras). With these security features, the project's demand for police services would not

noticeably affect the ability of the LAPD to provide adequate police services. Furthermore, a follow-up consultation was held with the LAPD on March 5, 2009 to review the project and the proposed security features. Per the LAPD, the design and character of the project, as well as the proposed security features, would serve to mitigate potential significant impacts on LAPD services. Thus, the project's impacts on police services would be less than significant.

Regarding emergency access to the project site, although additional traffic generated by the project could potentially cause delays in LAPD emergency response times, the additional traffic would not significantly impact emergency vehicle access or response times.

(c) Cumulative Impacts

Of the 94 related projects identified in Section III of this Draft EIR, all of the projects are located within the Hollywood Area boundaries with the exception of Related Project No. 3. Related projects in the Hollywood Area would cumulatively generate, in conjunction with the project, the need for additional police protection services. The related projects would generate a residential population of 17,373 people. Therefore, the related projects could potentially generate 570 additional crimes per year. Based on the non-residential population generation factors indicated in the *City of L.A. CEQA Thresholds Guide (2006)*, related projects could also generate a daytime non-residential population of 16,608. However, as noted above, no crime rate for non-residential uses is available; therefore, crimes associated with the related projects' commercial uses were not quantified.

The residential uses of the project in conjunction with the related projects could generate a cumulative total of 600 additional crimes per year. This represents a 7.9 percent increase in the Hollywood Community Police Station's 2007 crime rate (7,601 crimes/year). However, similar to the project, it is anticipated that related projects would be reviewed by the LAPD to ensure that sufficient security measures would be implemented to reduce potential impacts to police protection services. Furthermore, given the project's proposed security design features, the project's contribution to cumulative impacts would be less than significant.

(d) Mitigation Measures

As indicated above, impacts to police services would be less than significant. Notwithstanding, the following mitigation measures are recommended to further reduce impacts to police services.

Mitigation Measure H-3: The Project Applicant shall consult with the Los Angeles Police Department Crime Prevention Unit regarding crime prevention features appropriate for the design of the project.

Mitigation Measure H-4: Upon project completion, the Project Applicant shall provide the Hollywood Area Commanding Officer with a diagram of each portion of the property, including access routes and provide additional information that might facilitate police response.

(e) Level of Significance After Mitigation

With implementation of the project's proposed design features, impacts to police services would be less than significant. Furthermore, the mitigation measures described above would further reduce impacts.

(3) Schools

(a) Construction

There is one school located along the project's construction vehicle routes: Grant Elementary School (1530 North Wilton Place). This elementary school is located immediately northeast of the US-101 Freeway northbound off-ramp near Sunset Boulevard. The intersection of Wilton Place and Harold Way, which is designated by the LADOT as a pedestrian route for the elementary school, is located near the US-101 Freeway off-ramp. Moreover, a crossing guard is located at this intersection. However, there is a fork located within the off-ramp prior to reaching this intersection. Vehicles have the ability to stay to the left and access the intersection of Wilton Place and Harold Way, or veer to the right and access Sunset Boulevard. Because the project site is located along Sunset Boulevard, construction vehicles would veer to the right to access Sunset Boulevard and travel toward the project site. Therefore, construction vehicles associated with the project would avoid the intersection of Wilton Place and Harold Way. Therefore, Grant Elementary School would not be significantly impacted during project construction-related activities including worker travel, hauling activities, and the delivery of construction materials. Construction impacts on schools would be less than significant.

(b) Operation

The project would generate a total of 203 K-12 students, consisting of 98 elementary school students, 49 middle school students, and 56 high school students. Students generated by the project would attend Grant Elementary School, Le Conte Middle School, and Hollywood Senior High School. Build-out of the proposed project is expected to occur in 2013. With the addition of the 98 project-generated elementary students, Grant Elementary School would have an excess of 213 seats. During the 2012-2013 school year, Le Conte Middle School is projected to have an excess of approximately 48 seats. With the addition of the 49 project-generated middle school students, Le Conte Middle School would have a shortage of one seat. During the 2012-2013 school year, Hollywood Senior High School is projected to have an excess of 671 seats. With the addition of the 56

project-generated high school students, Hollywood Senior High School would have an excess of approximately 615 seats. The elementary and high schools serving the project (i.e., Grant Elementary School and Hollywood Senior High School) would not be significantly impacted due to project build-out, while the middle school serving the project site (i.e., Le Conte Middle School) could be impacted as it is projected to have a seating shortage of one seat due to the addition of project-generated students during the 2012-2013 school year. However, pursuant to Section 65995 of the California Government Code, with the payment of developer impact fees in accordance with Senate Bill (SB) 50 as outlined in Mitigation Measure H-5 below, project-related impacts on LAUSD school facilities would be reduced to a less than significant level. Compliance with SB 50 is considered full and complete mitigation.

(c) Cumulative Impacts

The related projects located within the attendance boundaries of the schools serving the project site (i.e., Grant Elementary School, Le Conte Middle School, and Hollywood Senior High School) could potentially generate 372 elementary school students, 257 middle school students, and 304 high school students. Therefore, the project in conjunction with related projects could generate 470 elementary school students, 306 middle school students, and 360 high school students. The project and related projects combined would exceed the projected capacities of Grant Elementary School and Le Conte Middle School. However, all related projects would be required to pay developer fees to LAUSD. The payment of the developer fees under the provisions of SB 50 would constitute as full mitigation for all impacts from all related projects to school facilities. Therefore, cumulative impacts to LAUSD schools serving the project site would be less than significant.

(d) Mitigation Measures

Mitigation Measure H-5: Pursuant to California Government Code Section 65995, the Project Applicant shall pay developer impact fees to Los Angeles Unified School District in accordance with Senate Bill 50.

(e) Level of Significance After Mitigation

With implementation of Mitigation Measure H-5 which ensures that the project Applicant will pay SB 50 developer fees, project impacts related to the school facilities serving the project site, including Grant Elementary School, Le Conte Middle School, and Hollywood Senior High School, would be less than significant.

(4) Parks and Recreation

(a) Public Recreation Plan

In order to meet the Public Recreation Plan (PRP) long-range standard for neighborhood parks, the project would be required to provide 1.8 acres of neighborhood parks. To meet the more realistic short- and intermediate-range standard, the project would be required to provide 0.9 acre of neighborhood parkland. The project would include 59,000 square feet (approximately 1.35 acres) of common open space which would be accessible to project residents. Thus, this common open space area would be considered "neighborhood park" space, as it would exclusively serve the "immediate neighbors" of the residential development. The project would therefore, meet and exceed the short and intermediate-range standards. However, the project would fall short of the long-range standards by 0.45 acres.

The project's provision of on-site open space would help reduce the use of community parks in the area. Nonetheless, project residents would still be expected to utilize the community parks' amenities including sports fields, tennis courts, basketball courts, and children's play areas. The project, therefore, would not meet the PRP's long range standard or short and intermediate range standards for community parks.

(b) City of Los Angeles Municipal Code

To meet the open space requirements of LAMC Section 12.21, the project would be required to provide 46,825 square feet of usable open space based on the number and type of units proposed. Of this amount, at least 23,413 square feet (50 percent) must be common open space area.

The project would provide a total of 76,400 square feet (approximately 1.75 acres) of usable open space consisting of 59,000 square feet of common open space and 17,400 square feet of private open space. As such, the project would meet and exceed the 46,825 square feet of total usable open space required by Section 12.21 of the LAMC.

According to Section 17.12 of the LAMC, the project would be required to dedicate 32 percent of the project site's gross subdivision area (203,861 square feet). Thus, the project would be required to dedicate 65,236 square feet (1.50 acres) of land. As discussed above, the project would provide 59,000 square feet (1.35 acres) of common open space. However, this land would not be dedicated but rather would be owned and maintained by the Project Applicant. The project's 59,000 square feet of common open space could be credited against the total parkland dedication requirement or the total in-lieu park fee requirement as determined by the Department of Recreation and Parks. With implementation of the recommended mitigation measure below, the project would comply with the parkland dedication requirements of Section 17.12 through the development of

additional recreational and park amenities site, payment of in-lieu fees to improve existing facilities in the park area, or through a combination of these methods.

(c) Cumulative Impacts

Of the 94 related projects identified in Section III, 55 are residential projects or have residential components. The related projects would potentially generate a population of approximately 25,263 residents. Therefore, the project in conjunction with the related projects would cumulatively generate a total population of 26,171 residents. In conjunction with the project, the related projects would cumulatively generate the need for additional parks and recreation facilities. However, all related projects with residential uses would be required to comply with the parks and recreation requirements of the PRP and LAMC Sections 12.21 and 17.12. Therefore, potential cumulative impacts related to parks and recreational facilities would be reduced to a less than significant level.

(d) Mitigation Measures

Mitigation Measure H-6: The Project Applicant shall at its election in compliance with LAMC Section 17.12 requirements, do one or a combination of the following: (1) develop recreational and park amenities o; (2) pay in-lieu fees to improve existing facilities in the park area; or (3) provide a combination such that the project would provide a total of three acres per 1,000 residents.

(e) Level of Significance After Mitigation

Implementation of Mitigation Measure H-6 would ensure that potential significant impacts to park and recreational facilities associated with the project, based on the maximum requirements established under the PRP and LAMC Section 17.12, would be reduced to a level that is less than significant. As the project complies with the requirements set forth in LAMC Section 12.21, no mitigation measures are required relative to LAMC Section 12.21 requirements. Thus, the project would meet the demand for services as addressed through those provisions. Potential impacts to park and recreational facilities related to the project would be less than significant.

(5) Libraries

(a) Operation

Development of the project would generate approximately 908 new residents. It is anticipated that project residents would primarily utilize the Frances Howard Goldwyn Regional Branch Library. This 19,000-square-foot regional branch, which underwent a major renovation in 2005-2006, serves a current population of 83,173 people. Build-out of

the project is anticipated to occur in 2013. According to Los Angeles Public Library (LAPL) by year 2010, the population of the Frances Howard Goldwyn Regional Branch Library service area will reach 91,980. The 2007 Facilities Plan recommends adding a second branch when the community reaches a service population above 90,000 people. Therefore, even without the new residents of the project, the Frances Howard Goldwyn Hollywood Regional Branch Library would exceed the recommended service population by 2010. Additionally, when applying the LAPL size criterion on a per capita basis, the LAPL size criterion equates to approximately 0.278 square feet per person (12,500 square feet ÷ 45,000 people). As indicated above, the project would generate an estimated 908 residents. Based on the size criterion of 0.278 square feet per capita, the project would result in a need for an additional 252 square feet of library space. This need would thus be nominal, representing two percent of the library's current size. Furthermore, it is not practical for libraries to add small increments of space due to demand attributable to new development projects. To achieve appropriate economies of scale, libraries are usually expanded when cumulative increases in demand justify major additions, as with the 1989 and 1998 bond programs described above.

Furthermore, it is expected that project residents would also utilize the Will and Ariel Durant Branch Library or the John C. Fremont Branch Library due to their proximity to the project site (1.3 miles and 1.6 miles respectively).

It should also be noted that the project would generate revenue to the City's general fund in the form of net new property tax, direct (i.e., from on-site commercial uses) and indirect (i.e., from household spending) sales tax, utility user's tax, gross receipts tax, real estate transfer tax on residential initial sales and annual resales, and other miscellaneous household-related taxes (e.g., parking fines). This revenue could be used to fund LAPL expenditures as necessary to offset the project's incremental impact on library services. Therefore, the project's impact relative to libraries would be less than significant.

(b) Cumulative Impacts

Of the 94 related projects, 55 are residential projects. The 55 residential projects would develop a total of 11,129 residential units with an estimated population of approximately 25,263 people. When including the project's estimated 908 residents, a cumulative total of approximately 26,171 new residents would be generated within the project area. If all 26,171 new residents utilized the Frances Howard Goldwyn Hollywood Regional Branch Library, cumulative development would increase further cause this library to exceed its target population based on its size criteria. However, it is unlikely that all residents would attend one library or the other. Furthermore, it is expected that each project would be reviewed on a project-by-project basis and would be expected to coordinate with the LAPL. In addition, related projects could also generate revenue to the City's general fund in the form of property taxes, sales taxes, etc. This revenue could be

used to fund LAPL expenditures as necessary to offset cumulative impacts on library services. Therefore, cumulative impacts to libraries would be less than significant.

(c) Mitigation Measures

As indicated above, impacts to libraries would be less than significant and no mitigation measures would be required.

(d) Level of Significance After Mitigation

Potential impacts to libraries as a result of implementation of the project would be less than significant and no mitigation measures would be required.

I. Transportation and Circulation

(1) Construction

Construction of the project would generate traffic from construction worker trips and construction truck trips (i.e., the arrival and departure of trucks for the removal of debris generated by on-site demolition and excavation activities). The number of construction workers would vary throughout construction activities with Phase 3 (building construction) generating the highest number of construction worker trips. The majority of the construction workers are anticipated to arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.), thereby avoiding generating trips during the A.M. and P.M. peak traffic periods. Demolition of the project site would involve the removal of approximately 2,538 cubic yards of demolition debris. Approximately 211 truck trips (arrivals and departures) would be required during the six-month demolition period which would result in approximately two truck trips per day. Excavation of the project site would involve the removal of approximately 190,000 cubic yards of earth. Approximately 10,417 truck trips (arrivals and departures) are expected during the six-month excavation period which would result in approximately 80 truck trips per day. As discussed previously, most, if not all, of these truck trips would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) to avoid generating trips during the P.M. peak period. The haul route for trucks leaving the project site would most likely be via El Centro Avenue or Gower Street south, to Sunset Boulevard east, to Highway 101. Although the ultimate demolition and excavation haul sites are not known at this time, trucks returning to the project site are expected to take the same route back. It is estimated that a maximum of 400 to 450 employee-related trips on a daily basis, including 200 to 225 arrivals and 200 to 225 departures. Construction workers are not all likely to arrive at the construction site within the same hour nor would they leave the site at the same time. Thus, the number of worker trips is expected to be substantially less than the peak hour trip generation

associated with the project once it is in operation (approximately 9,226 total external daily trips including 758 trips during the a.m. peak hour and 755 trips during the p.m. peak hour). Therefore, construction traffic-related impacts associated with the worker trips would be far less than those identified for project operation.

However, given the level of traffic at some of the study intersections near the project site, the combination of construction worker trips and construction truck trips could cause temporary adverse impacts at some intersections during construction activities. However, the City of Los Angeles would require the project to devise and implement a Construction Staging and Traffic Management Plan in compliance with LAMC requirements. The Construction Staging and Traffic Management Plan would identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of demolition and construction activities associated with the project. Therefore, compliance with regulatory requirements as outlined in Mitigation Measure I-1 below, would reduce construction-related impacts to a less than significant level.

Construction activities such as lane closures, sidewalk closures, and utility line construction, could have implications in relation to response time for emergency vehicles due to travel time delays. However, as discussed previously, the City of Los Angeles would require the project to devise and implement a Construction Staging and Traffic Management Plan as outlined in Mitigation Measure I-1. Therefore, potential impacts to emergency access during construction would be less than significant.

(2) Operation

(a) Intersections

The project is forecast to generate a net increase of 9,226 trips, including 758trips during the A.M. peak hour and 755 trips during the P.M. peak hour. These traffic volumes were added to the future 2013 without project traffic volumes. Based on the City of Los Angeles' significance thresholds criteria, the project would create a significant impact at the 13 study intersections listed below during the A.M. and/or P.M. peak hours.

- Vine Street & Sunset Boulevard
- Argyle Avenue/Franklin Avenue & US-101 northbound on-ramp
- Argyle Avenue & Hollywood Boulevard
- El Centro Avenue & Hollywood Boulevard
- El Centro Avenue & Sunset Boulevard
- Gower Street & Franklin Avenue

- Gower Street & Southbound US-101 off-ramp
- Gower Street & Hollywood Boulevard
- Gower Street & Selma Avenue
- Gower Street & Sunset Boulevard
- Bronson Avenue & Hollywood Boulevard
- Bronson Avenue & Sunset Boulevard
- US-101 southbound on-ramp & Sunset Boulevard

(b) Neighborhood Street Segments

Trips generated by the project would incrementally increase average daily traffic (ADT) volumes on each of the four neighborhood street segments by approximately 14.5 to 21.6 percent. Based on the City's significance thresholds criteria, the project would create a significant impact at three of the four neighborhood street segments.

(c) Project Access

The *City of L.A. CEQA Thresholds Guide (2006)* indicates that a project would have a significant impact on project access if the intersections nearest the primary site access are projected to operate at LOS E or F during the A.M. or P.M. peak hours under future with project conditions. The intersection of Gower Street and Selma Avenue on the northeast corner of the project site is expected to operate at LOS F during the A.M. peak hour and the intersection of Gower Street and Sunset Boulevard on the southeast corner of the project site is expected to operate at LOS F and E during the A.M. and P.M. peak hours, respectively. However, based on the site layout and usage patterns, it has been determined that the project's access driveways would not cause an adverse effect on either the project site or adjoining streets. Neither the City of Los Angeles Department of Transportation (LADOT) nor the L.A. CEQA Thresholds Guide has established a significance threshold regarding a project's potential impact on driveway access and on-street queuing at project driveways. Thus, impacts to access and queuing associated with the project were considered to be significant if the project resulted in on-street queuing that regularly interfered with traffic flow more than current conditions.

Vehicular access to the project site would be provided via stop-controlled driveways on Gower Street, Selma Avenue, and El Centro Avenue. The project driveways on Selma Avenue and El Centro Avenue would be full movement driveways, and the proposed driveway on Gower Street would be right turn only. All three project driveways are projected to operate at an overall LOS A during the A.M. and P.M. peak hours. In all cases, the worst delay would occur as vehicles existing site wait to access the main roadway. As

shown in the table, the highest level of delay would be at the Gower Street driveway for exiting vehicles with a LOS D and estimated delay of 31 seconds in the AM peak hour and 24 seconds in the PM peak hour. No significant access impacts would occur.

(d) Congestion Management Program

(i) Intersections

The Congestion Management Program (CMP) intersection monitoring locations within the vicinity of the project site are the intersection of Santa Monica Boulevard and Western Avenue and the intersection of Santa Monica Boulevard and Highland Avenue. According to Metro's 2004 CMP for Los Angeles County, a Traffic Impact Analysis (TIA) must be conducted at all CMP intersection monitoring locations where a project would add 50 or more trips during the A.M. or P.M. peak hours. Based on the project trip generation estimates and review of the project traffic volumes, the project is not expected to add more than 50 vehicles per hour to either of these two intersections during the A.M. or P.M. peak hours. Therefore, a TIA is not required for either of these two intersections.

(ii) Freeways

The CMP freeway monitoring location within the vicinity of the project site is US-101 south of Santa Monica Boulevard. According to Metro's 2004 CMP for Los Angeles County, a TIA must be conducted at all CMP freeway monitoring locations where a project would add 150 or more trips in either direction during the A.M. or P.M. peak hours. Based on the project trip generation estimates and trip distribution estimates, the project is estimated to result in a net increase of approximately 198 A.M. peak hour trips and 132 P.M. peak hour trips on US-101 south of Santa Monica Boulevard. Therefore, a TIA was conducted to determine potential impacts to the CMP freeway monitoring location. In addition to this CMP freeway monitoring location, three freeway segments (US-101 at Melrose Avenue, US-101 at Highland Avenue, and US-101 at Barham Boulevard) were analyzed in the Traffic Study due to their proximity to the project site and the number of trips to be generated at these locations. The project would increase the demand-to-capacity ratio (D/C) by a maximum of 0.019 (or 1.9 percent), this is less than the significance threshold of two percent. Therefore, the project would not create a significant impact at the CMP freeway monitoring location or the three freeway segments during the A.M. or P.M. peak hours.

(iii) Public Transit Service

When excluding the 15 percent transit credit per LADOT, the project is estimated to generate 911 net new vehicle trips during the A.M. peak hour and 907 net new vehicle trips during the P.M. peak hour. Applying the average vehicle rider factor of 1.4, it is estimated that the project would result in 1,275 person trips during the A.M. peak hours and 1,270 person trips during the P.M. peak hours. Assuming the 15 percent transit credit

applied to the project for its proximity to the Metro Red Line's Hollywood and Vine Station (located approximately one-quarter mile northwest of the project site), as well as the number of transit lines and routes that serve the Hollywood area, it is estimated that the project would generate191 new transit riders during both the A.M. and the P.M. peak hours.

The project site is located in close proximity to Metro Red Line's Hollywood and Vine Station, as well as a number of transit lines and routes that serve the Hollywood area. The bus services have a seating capacity of approximately 4,385 persons during the A.M. and P.M. peak hours based upon the seating capacity of 40 persons for a standard bus and 65 persons for a Metro Rapid articulated bus. With a total seating capacity of approximately 10,400 persons in the peak hours, the project would utilize approximately 2 percent of the available transit capacity during the peak hours. Given this nominal percentage and the high level of transit services available in the project area, it is concluded that the project would result in less than significant impacts to public transit service.

(e) Parking

Section 12.21.A.4 of the LAMC as well as the City's Residential Parking Policy sets forth parking requirements for various land uses, which are presented in Table IV.I-11. Based on these parking requirements, the project would be required to provide a total of 1,910 parking spaces (800 for residents, 200 for residential guests, and 910 for commercial and hotel uses) as shown in Table IV.I-11. It should be noted that in order to maintain a conservative analysis, all 400 residential units were assumed to be condominiums as the parking requirements for condominiums are higher than those of apartments. As shown in Table IV.I-11, the project proposes to provide 800 parking spaces for residents and 1,204 parking spaces for residential guests, commercial uses, and hotel uses for a total of approximately 2,004 parking spaces. Therefore, the project's parking supply would thus exceed LAMC parking requirements, and the project's parking impacts would be less than significant.

(3) Cumulative Impacts

The construction of 94 related projects is anticipated in the project area. These 94 related projects are dispersed throughout the project area and draw upon a workforce from all parts of the Los Angeles region. The majority of the construction workers are anticipated to arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.), thereby avoiding generating trips during the A.M. and P.M. peak traffic periods. In addition, the haul truck routes for the related projects would be approved by LADOT according to the location of the individual construction site and the ultimate destination. LADOT's established review process would take into consideration overlapping construction projects and would balance haul routes to

minimize the impacts of cumulative hauling on any particular roadway. Although the project would result in less than significant construction-related traffic impacts related to construction worker trips and truck trips, cumulative impacts are concluded to be significant and unavoidable due to the potential for concurrent construction of the related projects in the vicinity of the project site in conjunction with the project itself.

The traffic models utilized in the above analysis incorporated forecasted traffic increases due to ambient growth and related projects through the year 2013 (the build-out year of the project). Furthermore, the CMP analysis presented above evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections, neighborhood street segments, freeway segments, and the regional transportation system as a result of the project have been analyzed.

By comparing the future with project conditions to the existing conditions, increases in system-wide traffic volumes in the project vicinity are anticipated. It is anticipated that the individual related projects would be required to reduce potentially significant traffic impacts to the extent feasible. However, as no such guarantee exists in order to ensure that every project implements the required mitigation measures, it is conservatively concluded that cumulative development would yield a significant cumulative impact on intersection and roadway operations.

Impacts pertaining to project access are site-specific. In addition, the project would not result in access impacts. Thus, impacts associated with access would not be cumulatively considerable.

With regard to public transit, similar to the project, the related projects would generate an overall increase in transit riders. This effect is a positive impact and is consistent with City land use and transportation policies to reduce traffic. The increased transit ridership associated with the project and related projects is not expected to exceed the capacity of transit systems. Thus, cumulative impacts would be less than significant.

With regard to parking, it is anticipated that future related projects would be subject to City review to ensure that adequate parking and access would be maintained in the project vicinity. Therefore, cumulative impacts related to parking would be less than significant.

(4) Mitigation Measures

With implementation of the project design feature, as well as compliance with regulatory requirements, construction-related traffic impacts would be less than significant.

However, the following mitigation measure is recommended to ensure impacts remain less than significant.

Mitigation Measure I-1: Prior to the start of construction, the Project Applicant shall devise a Construction Staging and Traffic Management Plan to be implemented during construction of the project. The Construction Staging and Traffic Management Plan shall identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of demolition and construction activities associated with the project. The Construction Staging and Traffic Management Plan shall include but not be limited to, most, if not all, truck trips being scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) to avoid generating trips during the P.M. peak period. The Construction Staging and Traffic Management Plan shall be subject to final approval by LADOT.

The project would create a significant impact at 13 of the 27 study intersections during the A.M. and/or P.M. peak hours. Mitigation measures are available for eight of these 13 impacted intersections.

Mitigation Measure I-2: Vine Street & Sunset Boulevard: A closed-circuit television (CCTV) camera shall be installed at this intersection, fully mitigating the project's impact at this location. Traffic signal hardware upgrades are needed to provide for enhanced operation of the City's ATSAC signal system, and to allow LADOT to manage traffic in direct response to real-time traffic flow. The strategic placement of a CCTV camera affords LADOT with the ability to monitor vehicles and buses, and respond to incidents that cause excessive delays. These upgrades are expected to reduce the V/C ratio of an intersection by a minimum of 0.01.

Mitigation Measure I-3: El Centro Avenue & Hollywood Boulevard: A signal shall be installed at this intersection.

Mitigation Measure I-4: El Centro Avenue & Sunset Boulevard: Provide separate northbound and southbound left-turn lanes on El Centro Avenue. This mitigation would require re-striping the northbound and southbound approaches on El Centro Avenue. The restriping on the south leg would result in a 12-foot southbound through lane, 10-foot northbound left-turn lane, and 12-foot northbound through lane. The restriping on the north leg would result in a 15-foot southbound through lane, 10-footsouthbound left-turn lane, and 20-foot northbound through leg. This improvement would result in the loss of approximately eight metered on-street parking spaces on the north

El Centro Avenue leg and seven metered spaces on the south El Centro Avenue leg.

As part of the mitigation, the traffic signal controller at this intersection will also be upgraded to a Type 2070. The traffic signals at many of the intersections within the City of Los Angeles currently operate using older Type 170 traffic signal controllers. Newer Model 2070 controllers provide for enhanced and real-time operation of the traffic signal timing. Type 2070 controllers allow LADOT to provide instant adjustments to the signal's timing parameters based on real-time traffic conditions. These traffic signal hardware upgrades are needed to provide for enhanced operation of the City's ATSAC signal system, and to allow LADOT to manage traffic in direct response to real-time traffic flow. Upgrade of the controllers is expected to reduce the V/C ratio of an intersection by a minimum of 0.01.

Mitigation Measure I-5: Gower Street & Franklin Avenue: Provide operational improvements to the signal to provide left-turn phasing for the east-west left-turn movements and an overlapping right-turn arrow for the northbound right turn.

As part of the mitigation, the traffic signal controller at this intersection will also be upgraded to a Type 2070 and a CCTV camera will be installed. The traffic signals at many of the intersections within the City of Los Angeles currently operate using older Type 170 traffic signal controllers. Newer Model 2070 controllers provide for enhanced and real-time operation of the traffic signal timing. Type 2070 controllers allow LADOT to provide instant adjustments to the signal's timing parameters based on real-time traffic conditions. These traffic signal hardware upgrades are needed to provide for enhanced operation of the City's ATSAC signal system, and to allow LADOT to manage traffic in direct response to real-time traffic flow. The strategic placement of a CCTV camera affords LADOT with the ability to monitor vehicles and buses, and respond to incidents that cause excessive delays. These upgrades are expected to reduce the V/C ratio of an intersection by a minimum of 0.01.

Mitigation Measure I-6: Gower Street and Selma Avenue: A signal shall be installed at this intersection. Due to the offset of the Selma Avenue east and west legs at Gower Street, split phasing would need to be provided for the eastbound and westbound Selma Avenue approaches. Additionally, to maintain left turns in the northbound and southbound directions, a protected leading phase would be provided for the northbound lefts beginning concurrent with the

northbound through phase and a protected lagging phase would be provided for the southbound lefts, with left-turn pockets striped on both the northbound and southbound Gower Street approaches.

Mitigation Measure I-7: Bronson Avenue and Hollywood Boulevard: Restripe the south leg of the intersection to allow the addition of a northbound right-turn lane.

Mitigation Measure I-8: Bronson Avenue and Sunset Boulevard: Restripe the south leg of Bronson Avenue to add a southbound right-turn lane. The south leg of the intersection would result in a 14-foot northbound through lane, 12-foot northbound left-turn lane and a 24-foot southbound receiving lane. The north leg of the intersection would result in a 10-foot southbound right-turn lane, 10-foot southbound through lane, and 10-foot southbound left turn lane. The northbound receiving lane would be 18 feet. This improvement would result in the loss of approximately eight unmarked on-street parking spaces on the north Bronson Avenue leg and four unmarked spaces on the south Bronson Avenue leg.

As part of the mitigation, the traffic signal controller at this intersection will also be upgraded to a Type 2070. The traffic signals at many of the intersections within the City of Los Angeles currently operate using older Type 170 traffic signal controllers. Newer Model 2070 controllers provide for enhanced and real-time operation of the traffic signal timing. Type 2070 controllers allow LADOT to provide instant adjustments to the signal's timing parameters based on real-time traffic conditions. These traffic signal hardware upgrades are needed to provide for enhanced operation of the City's ATSAC signal system, and to allow LADOT to manage traffic in direct response to real-time traffic flow. Upgrade of the controllers is expected to reduce the V/C ratio of an intersection by a minimum of 0.01.

Mitigation Measure I-9: Gower Street & Sunset Boulevard: To partially mitigate the project's traffic impact at this location, however, the traffic signal controller will be upgraded to a Type 2070. The traffic signals at many of the intersections within the City of Los Angeles currently operate using older Type 170 traffic signal controllers. Newer Model 2070 controllers provide for enhanced and real-time operation of the traffic signal timing. Type 2070 controllers allow LADOT to provide instant adjustments to the signal's timing parameters based on real-time traffic conditions. These traffic signal hardware upgrades are needed to provide for enhanced operation of the City's ATSAC signal system, and to allow LADOT to manage traffic in direct response to

real-time traffic flow. Upgrade of the controllers is expected to reduce the V/C ratio of an intersection by a minimum of 0.01.

The project would create a significant impact at three of the four neighborhood street segments. Mitigation of these impacts would require development and implementation of a neighborhood traffic management plan that would identify measures to make local routes less attractive to through traffic, such as turn restrictions, chokers or narrowing of street widths, diverters or semi-diverters, cul-de-sacs or street closures, speed humps, and stop signs. Because implementation of neighborhood traffic controls on one street can potentially cause intruding traffic to shift to other streets, an effective neighborhood traffic management plan can only be implemented on an areawide basis with all affected parties involved in development of the plan, including neighborhood residents, council representatives, planners, and traffic engineers.

The City of Los Angeles has a neighborhood traffic management process in place that includes a number of specific steps. In the event that neighbors are concerned with the potential impact of a project, they may petition LADOT for a neighborhood traffic study. If traffic conditions have changed and if LADOT staff believes the changes are attributable to the project, LADOT staff will work with the neighbors to identify traffic calming/traffic management improvements that would address the traffic problem. If the neighbors agree that the suggested solutions are workable, the improvements would be installed on a trial basis. Once the improvements have been in place for a sufficient trial period (usually six months), the neighbors would be asked if they want the improvements to be installed on a permanent basis. If a sufficient number of neighbors approve, the improvements would be installed permanently. Since the Project Applicant cannot unilaterally impose these measures, no feasible mitigation measures have been identified for the impacted neighborhood street segments.

Access impacts would be less than significant. Notwithstanding, the following mitigation measures are recommended to further reduce impacts associated with access.

Mitigation Measure I-10: The Project Applicant shall use reasonable efforts to schedule truck deliveries during early morning hours so that trucks entering and exiting the parking structure do not interfere with vehicles accessing the parking structure during the typical A.M. and P.M. peak periods.

(5) Level of Significance After Mitigation

With implementation of Mitigation Measure I-1, construction-related traffic impacts would be less than significant.

With implementation of mitigation measures, project impacts to six of the 13 impacted intersections would be reduced to a less than significant level.

For the intersection of Gower Street and Franklin Avenue, the mitigation would mitigate the project impact to a less than significant level during the P.M. peak hour but not during the A.M. peak hour. While the mitigation would improve operations at this intersection to an acceptable LOS D during both the A.M. and P.M. peak hours, impacts to this intersection during the A.M. peak hour would be significant and unavoidable. In addition, for the intersection of Gower Street and Sunset Boulevard, Mitigation Measure I-9 would not fully mitigate during either peak hour. Due to physical constraints and/or adverse secondary impacts, impacts to the remaining five intersections would be significant and unavoidable (Argyle Avenue/Franklin Avenue & US-101 northbound on-ramp, Argyle Avenue & Hollywood Boulevard, Gower St. & US-101 southbound off-ramp, Gower Street & Hollywood Boulevard, Sunset Boulevard & US-101 southbound on-ramp). Thus, the project would result in significant and unavoidable impacts to a total of seven intersections. Since the Project Applicant cannot unilaterally impose mitigation measures to address the impacts the three impacted neighborhood street segments, impacts to the neighborhood street segments would be significant and unavoidable.

J. Utilities and Service Systems

(1) Water Supply

(a) Construction

(i) Water Demand and Distribution

A short-term demand for water may occur during demolition, excavation, grading, and construction activities on-site. These activities would occur incrementally through time (from the start of construction to project build-out) and would be temporary in nature. The demand for water would be for soil watering (i.e., fugitive dust control), clean up, masonry, painting, and other short-term related activities. Furthermore, the water demand generated by project construction activities would be offset by the reduction in water consumption resulting from the demolition of existing uses. Overall, demolition and construction activities would require minimal water demand and would not be expected to have any adverse impact on available water supplies or the existing water distribution system. Therefore, impacts associated with construction activities would be less than significant.

(b) Operation

(i) Water Demand

New development on the project site would result in an increase in long-term water demand for operational uses, maintenance, and other activities. According to the Water

Supply Assessment, the projected water demand for the project is estimated at approximately 188,656 gallons per day (gpd) or 210 acre feet (AF) annually. When existing uses on the project site and conservation features associated with the project are taken into account, a net water demand of approximately 136,501 gpd or 153 AF per year is produced.

LADWP's 2005 Urban Water Management Plan (UWMP) projects yearly water demand to reach 776,000 AF by 2030, or have an increase of 17 percent from 2005. Thus, the anticipated increased water usage of 153 AF annually would be within the available and projected water supplies for normal, single-dry, and multiple-dry years through the year 2030 water demand projections of LADWP's 2005 UWMP. LADWP concludes that it would be able to meet the water demand of the project as well as existing and planned future water demands of its service area.

In addition, compliance with State laws regarding water conservation measures, including pertinent provisions of Title 20 of the California Code of Regulations (CCR), as well as City of Los Angeles Ordinance Nos. 172,075 and 163,532, would reduce water consumption estimates for the project at full build-out, thereby reducing the demand on City supplies. Thus, potential impacts associated with water supply would be less than significant. In addition, mitigation measures have been included to ensure that water conservation efforts would be implemented in accordance with the requirements of LADWP.

(ii) Water Infrastructure

The water infrastructure serving the project site consists of water mains located in the City streets surrounding the project site including a 10-inch water main in Sunset Boulevard and 8-inch water mains in Gower Avenue, Selma Avenue, and El Centro Avenue. Fire flow requirements typically dictate whether an existing water infrastructure system is adequate as fire flow demands are higher than domestic water demands. Based on the adequate residual pressures of the existing water mains for domestic and fire flows, the existing water infrastructure would be adequate to meet the project's fire flow requirements.

(c) Cumulative Impacts

(i) Water Supply

LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by LADWP accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Additionally, under the provisions of SB 610, LADWP

is required to prepare a comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area. The types of projects subject to the requirements of SB 610 tend to be larger projects (e.g., residential projects with at least 500 dwelling units, shopping centers employing more than 1,000 persons or having more than 500,000 square feet of floor space, commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space, etc.) that may or may not have been included within the growth projections of the UWMP. The water supply assessment for such projects, in conformance with the UWMP, evaluates the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed. In addition, as described above, SB 221 requires that for residential subdivisions with 500 units or more that are in non-urban areas, written verification from the service provider (e.g., DWP) be submitted indicating sufficient water supply is available to serve the proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are or will be available prior to completion of the project.

Section III, Environmental Setting, of this Draft EIR identifies 94 related projects anticipated to be developed within the project vicinity. The related projects would have an average daily water demand of approximately 760,932 gpd or 4,213 AF annually. The project in conjunction with the related projects would yield a total average daily water demand of approximately 3,949,588 gpd or 4,423 AF annually. As previously stated, the LADWP's 2005 UWMP has projected water demands to reach 776,000 AF annually by 2030 or have an increase of 17 percent from 2005. The project in conjunction with the related projects would have an estimated average daily water demand of approximately 4,423AF annually, which would fall within the available and projected water demand of the LADWP's 2005 UWMP. Furthermore, as the UWMP plans and provides for water supplies to serve existing and projected needs, including those of future growth and development as may occur through related projects, and the requirements of SB 610 and SB 221 provide means to ensure that the water supply needs of notable development projects are carefully considered relative to LADWP's ability to adequately meet future needs. It is therefore anticipated that LADWP would be able to supply the demands of the project and related projects through the foreseeable future. Therefore, the cumulative impacts due to the water demand of the related projects in combination with the project would not be significant.

(ii) Water Infrastructure

Development of the project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. However, each related project would be subject to discretionary review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Furthermore, LADWP, Los Angeles Department of Public Works, and the

City of Los Angeles Fire Department would conduct ongoing evaluations to ensure facilities were adequate. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

(iii) Global Warming and Water Supply

There are complex physical, chemical, and atmospheric mechanisms involved in global climate change that make it difficult to predict what the effects of global climate change will be, particularly at a State or local level. Due to this unpredictability, the secondary affects that global climate change may have on water supplies for a given region is even more difficult to predict. The science on global warming is still evolving and has not reached a point where it can be quantified and incorporated into delivery projections of the SWP. Furthermore, policy recommendations on how to incorporate potential changes to water supply due to climate change into water resource planning and management are still being developed. Therefore, consistent with studies prepared by the California Department of Water Resources (DWR), it is considered premature to make an assessment of impacts under CEQA of how climate change will affect water availability for the project.

(d) Mitigation Measures

Based on the analysis above, the project would not result in significant impacts related to water supply. However, the following mitigation measures are recommended to ensure that the project would be compliant with the City's recommended water conservation measures:

Mitigation Measure J-1: For the commercial uses on the project site, the applicant shall (unless otherwise required and to the satisfaction of the Department of Building and Safety):

- Install high-efficiency toilets (maximum 1.28 gpf), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.

- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.

Mitigation Measure J-2: For the residential uses on the site, the applicant shall (Unless otherwise required) and to the satisfaction of the Department of Building and Safety:

- Install a demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwelling(s);

- Install no more than one showerhead per shower stall, having a flow rate of no greater than 2.0 gallons per minute;

- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations; and,

- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

Mitigation Measure J-3: In addition to the requirements of the Landscape Ordinance, the landscape plan for the project shall incorporate the following:

- Weather-based irrigation controller with rain shutoff;

- Matched precipitation (flow) rates for sprinkler heads;

- Drip/microspray/subsurface irrigation where appropriate;

- Minimum irrigation system distribution uniformity of 75 percent;

- Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials;

- Use of landscape contouring to minimize precipitation runoff; and

- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 square feet and greater, to the satisfaction of the Department of Building and Safety.

(e) Level of Significance After Mitigation

No significant impacts to the City's water supply would occur as a result of the project. The mitigation measures above would further ensure that such impacts would remain less than significant.

(2) Wastewater

(a) Construction

During construction of the project, a negligible amount of wastewater would be generated by construction staff. It is anticipated that portable toilets would be provided by a private company and the waste disposed of off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

(b) Operation

(i) Wastewater Generation and Infrastructure

The project would generate a net increase of approximately 131,584 gpd (0.13 mgd) of wastewater on an average day and 223,692 gpd (0.23 mgd) of wastewater on a peak day. Based on the Sewer Capacity Availability Request provided by LADPW Bureau of Engineering, the 10-inch sewer main in El Centro Avenue, to which the entire project would connect, has sufficient capacity to accommodate the project. Additionally, it may be possible that the existing sewer connections serving the office buildings/studios on the project site could be retained to serve the renovated uses within the buildings to remain. Therefore, the impact of wastewater generation from the project to conveyance infrastructure would be less than significant.

(ii) Wastewater Treatment

Wastewater generated by the project would ultimately be conveyed via the Hyperion Treatment Conveyance System to the Hyperion Treatment Plant (HTP). The average dry weather flow (ADWF) for the Hyperion Treatment Conveyance System service area is projected to be approximately 477.3 mgd in 2010, 492.3 mgd in 2015, and 511.3 mgd in 2020. The average dry weather flow (ADWF) projections for the Hyperion Treatment Conveyance System service area in year 2010, 2015, and 2020, are approximately

477.3 mgd, 492.3 mgd, and 511.3 mgd, respectively. These wastewater flow projections are well within the current 550 mgd Hyperion Treatment Conveyance System treatment capacity. According to these projections and based on existing capacity, the Hyperion Treatment Conveyance System would still have a capacity of 73 mgd (or 13 percent) in 2010, 58 mgd (or 10 percent) in 2015, and 39 mgd (or 7 percent) in 2020.The project's wastewater generation would contribute an average wastewater flow of 154,914 gpd (0.15 mgd) and a peak flow of 263,354 gpd (0.26 mgd), which could be easily accommodated within the projected available treatment capacity of the Hyperion Treatment Conveyance System for 2015 (58 mgd) and 2020 (39 mgd) without considering the 20 mgd increase in capacity to 570 mgd expected with implementation of the IRP improvements. Furthermore, the wastewater generation estimate does not account for reductions in wastewater that would occur with implementation of water conservation measures presented in Section IV.J.1, Water Supply, of this Draft EIR. Lastly, the project would be required to pay a connection fee through the Connection Fee Program that would ensure that all users pay a fair share for necessary expansions of the sewer system, additional improvements to conveyance, treatment, and disposal facilities. As such, the increase in wastewater flows generated by the project would have a less than significant impact on wastewater treatment facilities.

In addition effluent conveyed to the HTP would not have a significant effect on the Santa Monica Bay, as HTP continually monitors all effluent, currently meets applicable water quality standards, and is required to comply with water quality standards established for beneficial uses.

(c) Cumulative Impacts

Section III, Environmental Setting, of this Draft EIR identifies 94 related projects that are anticipated to be developed within the vicinity of the project site and that are within the service areas of the Hyperion Treatment Conveyance System and HTP. These related projects would cumulatively contribute, in conjunction with the project, to the wastewater generation in the project area. The estimated wastewater generation associated with related projects on average is approximately 3,112,123 gpd (3.12 mgd) with a peak flow of 5,290,609 gpd (5.29 mgd). The project would contribute 154,914 gpd (0.15 mgd) with a peak flow of 263,354 gpd (0.26 mgd) to this estimated generation for a total of 3,267,037 gpd (3.26 mgd) with a peak flow of 5,553,963 gpd (5.5 mgd).

As discussed above, the Hyperion Treatment Conveyance System has a current capacity of 550 mgd and a current ADWF of approximately 410 mgd. By 2015 and 2020, the ADWF of the Hyperion Treatment Conveyance System is projected to be 492.3 mgd and 511.3 mgd, respectively. For 2015 and 2020, the cumulative wastewater flows would increase the projected ADWF to 495.5 mgd, and 514.5 mgd, respectively. The ADWF projections in conjunction with the cumulative wastewater estimate from related projects

represents a conservative analysis as the ADWF projections already take into account future population growth, including growth such as that represented by related projects.

As with the project, each related project proposing to connect to the City sewer system would be subject to City Ordinance No. 166,060 requiring a determination by LADPW that there is allotted sewer capacity available for the project. Furthermore, implementation of the IRP and completion of the "Go-Projects" including improvements throughout the Hyperion Treatment Conveyance System consisting of the expansion of the TWRP and improvements at HTP, LAGWRP, and the wastewater collection system, capacity of the Hyperion Treatment Conveyance System would be increased to 570 mgd. The IRP would increase the treatment capacity of TWRP and treatment process at LAGWRP, which would result in less bypass flows to HTP for processing. As such, LADPW anticipates ample wastewater treatment services to the City of Los Angeles and contracting cities through the year 2020. Therefore, cumulative impacts associated with wastewater treatment would be less than significant.

HTP currently meets applicable water quality standards as set forth by the NPDES. As such, the cumulative wastewater effluent discharged to the Santa Monica Bay would have a less than significant impact on water quality. Implementation of the IRP, upgrades in the advanced treatment processes at HTP, and continual monitoring by the EMD would ensure that effluent discharged into Santa Monica Bay are within applicable limits. Thus, cumulative impacts on Santa Monica Bay water quality would be less than significant and the project's contribution to the impact would not be cumulatively considerable.

(d) Mitigation Measures

Potential impacts related to wastewater due to construction and operation of the project would be less than significant. Therefore, no mitigation measures are required.

(e) Level of Significance After Mitigation

The project would result in less than significant impacts with regard to wastewater.

(3) Solid Waste

(a) Construction

Construction of the project would require earthwork, demolition or renovation of existing buildings, as well as the construction of new buildings on the project site. Each of these activities would generate construction and demolition (C&D) waste that would be disposed of in the County's unclassified landfills. Utilizing generation factors established by the Environmental Protection Agency (EPA) and California Integrated Waste Management

Board (CIWMB), construction of the project is estimated to generate 199,500 tons of soil, 2381 tons of demolition debris, 1,269 tons of renovation debris, and 2,076 tons of construction debris for a combined total of 205,226 tons of C&D waste. It is anticipated that some of the C&D waste generated would be recycled to the extent feasible. The remaining C&D waste would be disposed of at one of the County's unclassified landfills open to the City of Los Angeles for their C&D waste disposal needs. The project's total solid waste generation during construction would represent approximately 0.4 percent of the 2007 estimated remaining capacity at the County's unclassified landfills open to the City of Los Angeles. Based on the average 2007 unclassified landfill disposal rate, unclassified landfills would have adequate capacity for the next 372 years and generally do not face capacity shortages. Therefore, the County's unclassified landfills would have adequate capacity to accommodate project-generated inert waste. Thus, construction impacts relative to solid waste would be less than significant.

(b) Operation

The project site is currently developed with 136,233 square feet of office/studio uses that generate solid waste. Based on solid waste generation factors established by CIWMB in the June 2006 Targeted Statewide Waste Characterization Study, it is estimated that these existing uses generate approximately 139 tons of solid waste per year. Based on solid waste generation factors set forth in the L.A. CEQA Thresholds Guide (2006), as well as factors established by CIWMB in a June 2006 Targeted Statewide Waste Characterization Study, the residential uses are estimated to generate approximately 893 tons of solid waste per year, the hotel approximately 252 tons of solid waste per year, the offices approximately 380 tons of solid waste per year, and the retail and restaurant/bar uses would generate approximately 57 and 299 tons of solid waste per year, respectively for a combined total of approximately 1,882 tons of solid waste per year. This is 1,742 tons of solid waste per year over existing uses. It is anticipated that some of the solid waste generated would be diverted via project design features. The remaining solid waste would be disposed of at one of the County's Class III landfills open to the City of Los Angeles for their solid waste disposal needs. The project's total solid waste generation during operation would represent an approximate 0.05 percent increase in the City's yearly solid waste disposal quantity (based on 2007 quantities), and represents approximately 0.001 percent of the 2013 estimated remaining capacity at the County's Class III landfills open to the City of Los Angeles. These figures do not take into account the amount of the project's waste that would be diverted and therefore, is a conservative estimate.

As described in the Los Angeles County Integrated Waste Management Plan (CoIWMP) 2006 Annual Report, future disposal needs over the next 15 year planning

horizon (2020) would be adequately met through the use of in-County and out-of-County facilities.[7] It should also be noted that with each subsequent Annual Report, the 15-year planning horizon is extended by one year, thereby providing sufficient lead time for the County to address any future shortfalls in landfill capacity.

Based on the above, project-generated waste would not exacerbate the existing shortfall of landfill capacity such that the projected timeline for the County's Class III landfills to reach capacity would be altered. The available capacity of the existing and/or planned landfills would not be exceeded, and impacts on solid waste generation from project operations would be less than significant.

(c) Cumulative Impacts

Construction of the project in conjunction with related projects would generate C&D waste and thus, would cumulatively increase the need for waste disposal at the County's unclassified landfills. As analyzed above, the project would generate a combined total of 205,266 tons of C&D waste which constitutes approximately 0.4 percent of the 2008 estimated remaining capacity at the County's unclassified landfills open to the City of Los Angeles. Thus, the project's contribution to a cumulative impact on unclassified landfills would not be significant. Additionally, as stated above, the County's unclassified landfills have adequate capacity for the next 372 years. As such, future shortage of disposal capacity at unclassified landfills is not expected. Further, related projects would be subject to environmental review on a case-by-case basis and thus, are anticipated to recycle C&D waste to the maximum extent feasible. Based on the above, cumulative solid waste impacts due to project construction are concluded to be less than significant.

Based on solid waste generation factors set forth in the *City of L.A. CEQA Thresholds Guide* (2006), as well as factors established by CIWMB in a June 2006 Targeted Statewide Waste Characterization Study, the solid waste generation for related projects is forecasted to be 40,524 tons per year. In conjunction with the project, the total cumulative solid waste generation would be 42,406 tons of solid waste per year. Based on the project's estimated 1,882 tons of solid waste generated per year, the project's contribution to cumulative solid waste generation would be approximately 339,248 tons by 2021.[8] Thus, the project's solid waste generation would represent approximately 0.21 percent of the County's projected 164.2 million tons of waste disposal need through

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[7] *Los Angeles County Integrated Waste Management Plan 2005 Annual Report, May 2007, http://ladpw.org/swims/Upload/2005%20Annual%20Report%20-%20Signed_9618.pdf, accessed May 21, 2007.*

[8] *Based on a 9-year period beginning January 1, 2012 (build-out year of project), through the end of 2020.*

2020.[9] Given the small percentage and the County's forecast of 15 years of available landfill capacity, cumulative impacts on landfill capacity are concluded to be less than significant.

Furthermore, it is anticipated that related projects would be subject to environmental review on a case-by-case basis to ensure that they would not conflict with Assembly Bill (AB) 939 waste diversion goals or the solid waste policies and objectives in the City's Source Reduction and Recycling Element (SRRE) or its updates, the City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), and the General Plan Framework. Therefore, cumulative impacts to solid waste regulations, plans, and programs from implementation of the project and related projects would be less than significant.

(d) Mitigation Measures

Based on the above analysis, with implementation of the project design features, impacts with regard to solid waste would be less than significant. Nevertheless, the following mitigation measures are recommended to ensure that potential impacts remain less than significant.

Mitigation Measure J-1: In accordance with the City of Los Angeles Ordinance No. 171687, the project Applicant shall allocate adequate storage space on-site for the collection and loading of recyclable materials.

Mitigation Measure J-2: The project Applicant shall prepare, and thereafter implement, a plan that designs primary collection bins to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities.

Mitigation Measure J-3: All residential and commercial uses established within the project site shall be permanently provided with clearly marked, durable, source sorted recyclable bins at all times to facilitate the separation and deposit of recyclable materials.

(e) Level of Significance After Mitigation

Implementation of the recommended mitigation measures would ensure that impacts with regard to solid waste would be less than significant.

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[9] *Los Angeles County Integrated Waste Management Plan 2005 Annual Report May 2007, http://ladpw.org/swims/Upload/2005%20Annual%20Report%20-%20Signed_9618.pdf, accessed May 21, 2007.*

K. Population, Housing, and Employment

(1) Construction

Project development would generate construction workers on-site at any one time during the demolition, grading and excavation, and building construction and finishing phases. However, individual construction projects would not necessarily generate new employment within the region. Rather, there is a pool of construction workers who move from project to project and are somewhat mobile. To the extent that the project supports and contributes to the pool of construction workers, its impacts would be considered beneficial. Since construction activities related to the project would not exceed expected growth, construction-related employment impacts would be less than significant.

(2) Operation

The project's residential population of 908 new residents would represent a total of 5.49 percent, 0.95 percent, and 0.20 percent of the population growth projected by SCAG for the local, subregional, and regional areas, respectively, from 2007 to 2013. The 400 new dwelling units included in the development of the project would represent a total of 3.60percent, 0.50 percent, and 0.22 percent of the total household growth projected by SCAG for the local, subregional, and regional areas, respectively. The project would also generate approximately 1,727 net new employees to the project site, which represents approximately 48.65 percent, 2.90 percent, and 1.03 percent of SCAG's overall employment growth projections for the local, subregional, and regional areas, respectively. While project employees would comprise a large portion of the employment growth forecasted for the local area, given the current economic trends, project employment would represent a positive contribution to the tax base of the area (and the City as a whole).

The project's anticipated population, housing, and employment growth would not exceed SCAG's forecasted growth projections for the Hollywood Community Plan Area. The anticipated growth also would be consistent with SCAG's subregional and regional growth projections. The project anticipates providing a wide range of dwelling units, which would help to meet the housing demands in the City and the Hollywood Community in particular. In addition, while the project would create an increase in job opportunities that could potentially increase housing demand to a commercial corridor area in need of housing, the project would add 400 housing units to meet housing demand. Lastly, the project site is located in an urban area already served by existing infrastructure and an established transportation system, and the proposed mix of uses would provide a balance of jobs and housing, and would cluster development so as to create an activity center and provide for the efficient provision of infrastructure. While the project would provide new connections to existing utility systems and would include on-site fire prevention and safety measures to reduce demand for fire and police services, such improvements would not

cause population growth or accelerate development in an unplanned area that exceeds projected/planned levels. For the reasons described above, potential impacts relative to population, housing, and employment growth would be less than significant.

(3) Cumulative Impacts

Cumulative growth was not analyzed within the local context as many of the related projects are not located in the same local area as the project (i.e., the Hollywood Community Plan area). However, all of the related projects are located within the same subregional and regional areas as the project.

The subregional and regional cumulative population increase that would result from the project in combination with the related projects would total 26,171residents. Compared to the SCAG-projected population increase of 95,869 for the subregional area, the cumulative population would represent 27.30 percent of the SCAG-projected growth. Compared to the SCAG-projected population increase of 178,287residents for the regional area, the cumulative population would represent 5.70 percent of the SCAG-projected growth.

The cumulative housing growth in the subregional and regional areas attributed to the project in combination with the related projects would be 11,529. Compared to the SCAG-projected housing increase of 80,615 for the subregional area, the cumulative households would represent 14.30 percent of the SCAG-projected growth. Compared to the SCAG-projected housing increase of 178,287 for the regional area, the cumulative total would represent 6.47 percent of the SCAG-projected growth.

With regard to cumulative employment growth, related projects would generate approximately 16,909 employment opportunities. Combined with the project's estimated 1,727 employees, the cumulative employment total would be 18,636, which would represent 31.28 percent of the subregional employment growth and 11.14 percent of the regional employment growth. While cumulative employment growth would represent a noticeable percentage of the forecasted growth, such cumulative employment growth would be considered beneficial to the City and the regional economy, especially given the current market conditions.

Overall, cumulative population, housing, and employment projections for the local, subregional and regional levels would be below SCAG projections and, therefore, would be less than significant. As such, impacts related to population, housing, and employment would be less than significant.

(4) Mitigation Measures

No mitigation measures would be necessary as impacts on population, housing, and employment would be less than significant.

(5) Level of Significance After Mitigation

No mitigation measures are necessary as project impacts on population, housing, and employment would be less than significant.

II. Project Description

II. Project Description

A. Introduction

The purpose of this section is to describe the project in a useful and comprehensible manner to the public, agencies, and decision-makers. CEQA Guidelines Section 15124 requires a project description to contain: (1) a regional map showing the location and boundaries of the project; (2) a statement of objectives sought by the project, including the underlying purpose of the project; (3) a general description of the project's technical, economic, and environmental characteristics; and (4) a statement briefly describing the intended uses of the EIR, including a list of agencies that are expected to use the EIR in their decision-making, a list of permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, state, and local laws, regulations, or policies.

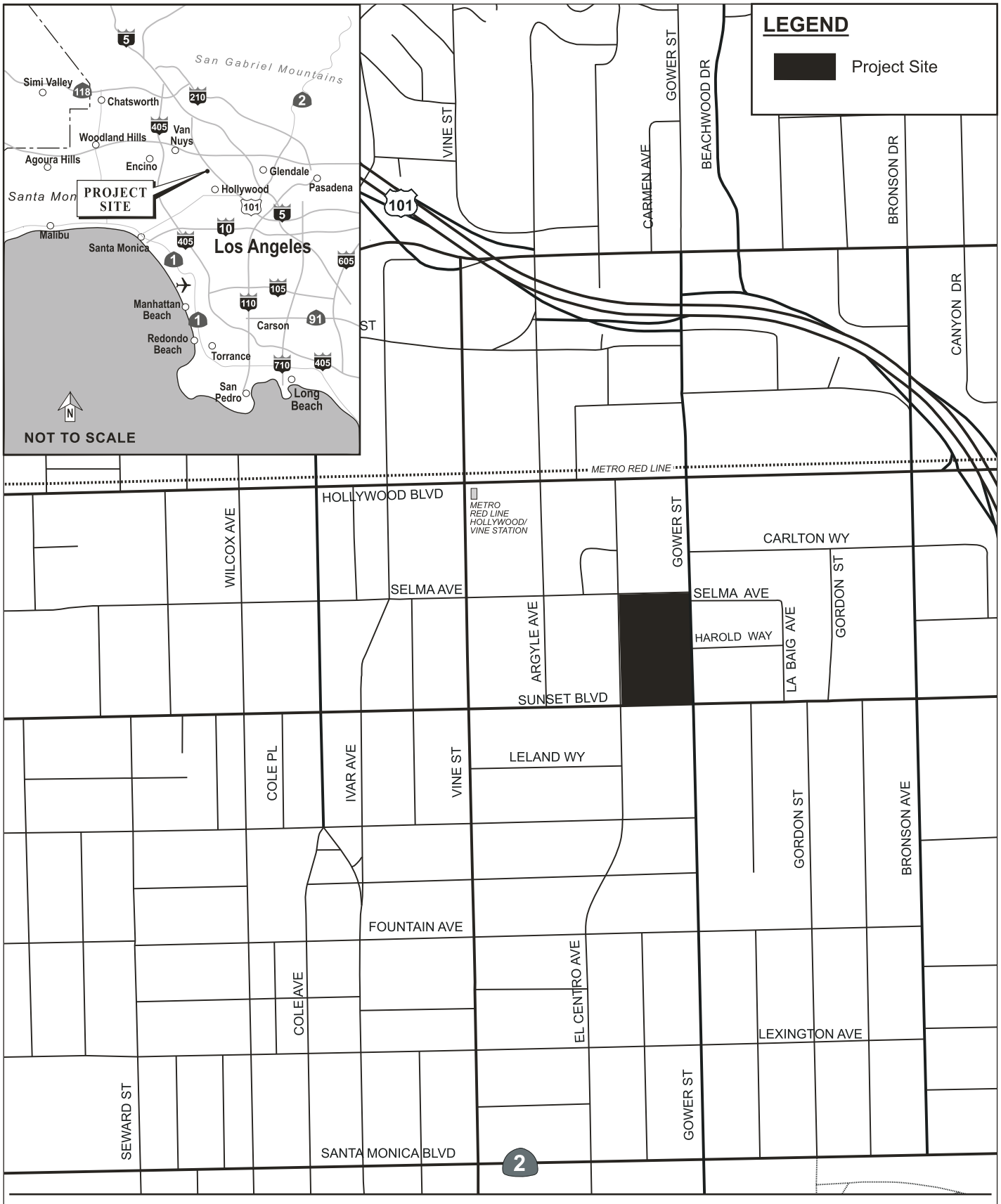
PPD Gower I, LLC the Project Applicant, proposes to develop the Columbia Square Project (project) in the Hollywood Community of the City of Los Angeles (City). The Columbia Square Project would provide a vertically integrated mix of uses that would assist in promoting Hollywood as a center of population, employment, retail services and entertainment. Specifically, the project would provide 400 residential units, a 125-room hotel, approximately 380,000 square feet of office space, and approximately 41,300 square feet of retail and restaurant/bar uses (including restaurant/bar uses in the hotel) on a 4.68-acre site located at the northwest corner of Sunset Boulevard and Gower Street. Included within these project uses is approximately 105,510 square feet of existing building area (91,110 square feet for office and 14,400 square feet for retail and restaurant/bar) that would be retained and rehabilitated to the Secretary of Interior Standards from the existing 136,233-square-foot Columbia Square Complex. In addition, a substantial part of the project would include landscaped courtyards and pathways and other open space features connecting the various proposed uses that would establish a more pedestrian-oriented environment within the project vicinity. Amenities such as recreation rooms, swimming pools, and landscaped recreational areas would also be provided for residents and guests. The project would also include a multi-level parking facility (including three subterranean levels) providing a capacity of approximately 2,004 parking spaces. The parking facility would be integrated into the more central portion of the project site and with the exception of vehicular access points, would not be visible from public rights-of-way.

The Applicant has conducted community outreach and received comments on the project during the preparation of this Draft EIR. The Applicant has recognized that height is a major concern for the project. Accordingly, analysis of an alternative that would reduce the project's height has been provided and is included as Alternative 6 as described in Section V, Alternatives of this Draft EIR. Alternative 6 would result in a reduction in floor area, with a Floor Area Ratio (FAR) of 4.3 as compared with the project's FAR of 5.4, thereby reducing the height of the residential tower from 447 feet at the tallest habitable floor to 315 feet at the tallest habitable floor. Similar to the proposed project, Alternative 6 would rehabilitate approximately 105,510 square feet of the existing Columbia Square Complex space (of which 91,110 square feet would be used for office uses and 14,400 square feet for retail and restaurant/bar uses). In addition, new buildings under Alternative 6 would include 200 residential units, 351,500 square feet of office uses, 125 hotel rooms and 26,900 square feet of retail land restaurant uses. Appendix L of this Draft EIR provides additional analysis for Alternative 6 for use by the decision-makers should this Alternative be adopted.

B. Project Location and Surrounding Uses

The project site consists of 4.68 acres (203,861 square feet) generally bound by Selma Avenue to the north, Gower Street to the east, Sunset Boulevard to the south, and El Centro Avenue to the west in the Hollywood Community of the City of Los Angeles as shown on Figure II-1 on page II-3. The site is approximately six miles northwest of the City's downtown area and approximately 13 miles northeast of the Pacific Ocean (refer to inset on Figure II-1).

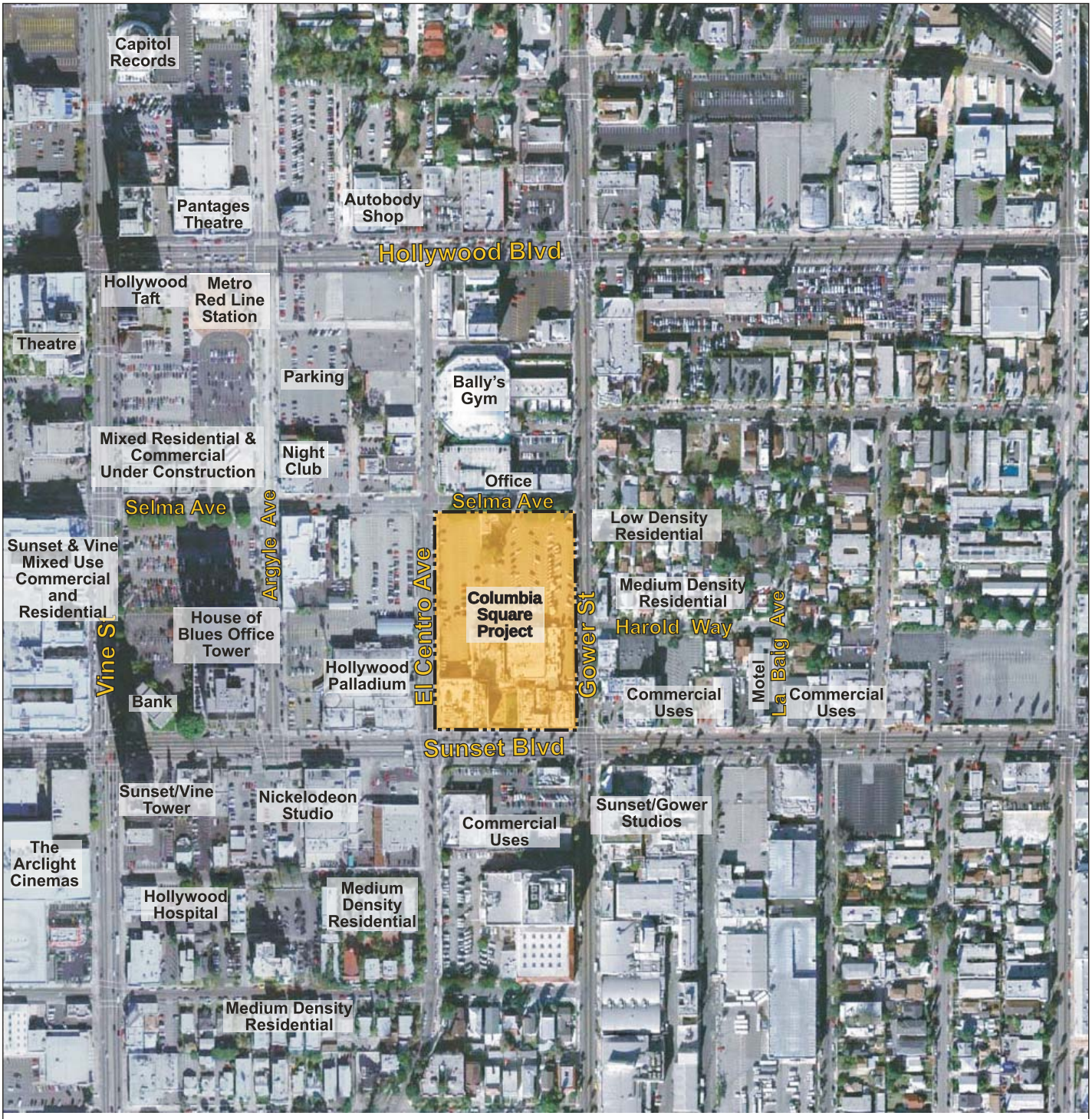
The Hollywood Freeway (US-101 Freeway), as well as a network of major roadways including Sunset Boulevard, Santa Monica Boulevard, and Hollywood Boulevard provides regional and local access to the project site. The project site, which is located along a major transit corridor, Sunset Boulevard, is well-served by several local and regional bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT). The project site is also located approximately 600 feet from Hollywood Boulevard, which is also a major transit corridor, and is approximately 850 feet south and east of a high-capacity Metro Rapid Bus stop located on Argyle Avenue between Hollywood Boulevard and Selma Avenue. Moreover, the site is located approximately 1,285 feet (less than one-quarter mile) from the entrance to the Metro Red Line Hollywood and Vine Station located just west of the intersection of Hollywood Boulevard and Argyle Avenue. The project vicinity is highly urbanized and has been undergoing a substantial transformation within recent years due to new developments that have been completed or currently under construction. As shown in the aerial photograph provided on Figure II-2 on page II-4, land uses surrounding the project site include a mix of residential, office, and commercial/retail uses with associated parking.



matrix environmental

Figure II-1
Regional and Project Vicinity Map

Source: Matrix Environmental, 2009



Columbia Square

matrix environmental

0 400 800 Feet

Figure II-2
Aerial Photograph with Surrounding Land Uses

Source: Google Earth Pro 2008; Sanborn 2008; Matrix Environmental, 2009

Immediately north of the project site at the northeast corner of El Centro Avenue and Selma Avenue, is a four-story parking structure. This structure provides parking for the commercial uses, including a recreation/workout facility and a car wash located north of the parking structure. Directly to the east of the parking structure facing the project site is a two-story office building, the Rich Mar building, that extends to the northwest corner of Gower Street and Selma Avenue. Located to the east of the project site across Gower Street and north of Harold Way, is a mix of uses including one- and two-story office uses, neighborhood retail uses, and a two-story apartment building. Single-family residential uses are located further to the east of the project site along Harold Way. Located to the east of the project site between Harold Way and Sunset Boulevard is the Sunset Gower Plaza, which includes a bakery, a restaurant and bar, office uses, and associated surface parking. Directly southeast of the project site along Sunset Boulevard and east of Gower Avenue is a range of non-residential uses, including a restaurant, an office building, and the Sunset Gower Studios. Immediately south of the project site along the south side of Sunset Boulevard and west of Gower Street is a commercial strip mall, the "Gower Gulch," which includes a mix of restaurant and retail establishments, a grocery store, and surface parking. Immediately southwest of the project site, along the south side of Sunset Boulevard and west of El Centro Street, is a car wash and commercial uses. Office uses and one- and two-story multi-family residential uses are located further south of the uses that front Sunset Boulevard. Directly to the west of the project site north of Sunset Boulevard and west of El Centro Avenue is the Hollywood Palladium event venue and associated surface parking. The 21-story House of Blues office tower (Sunset Media Tower) is also located along Sunset Boulevard further west of the project site. Northwest of the project site at the northwest corner of El Centro Avenue and Selma Avenue, is a mix of one- and two-story commercial and office uses with associated parking.

With the exception of the properties fronting the east side of Gower Street, which are designated by the Hollywood Community Plan for Highway Oriented Commercial land uses, and the parking lot of the Hollywood Palladium event venue along the west side of El Centro Avenue and the property located on the southeast corner of Sunset Boulevard and Gower Street, which are designed for Commercial Manufacturing land uses, the majority of the adjacent and surrounding properties are designated for Regional Commercial land uses by the Hollywood Community Plan.

C. Background and Existing Site Conditions

Historically, uses on the project site have included radio and television studio and offices, as well as single-family and duplex residential uses. The project site was originally divided into two square blocks with an east-west street (first known as Salem Place and then as Harold Way) bisecting the site into two parcels. Occupied by the Blondeau Tavern beginning in 1899, use of the southern parcel shifted to motion picture production in 1911. The original structure associated with the CBS Columbia Square Complex (previously known as the KNX/CBS studios), which was designed by William Lescaze, opened in 1937. The

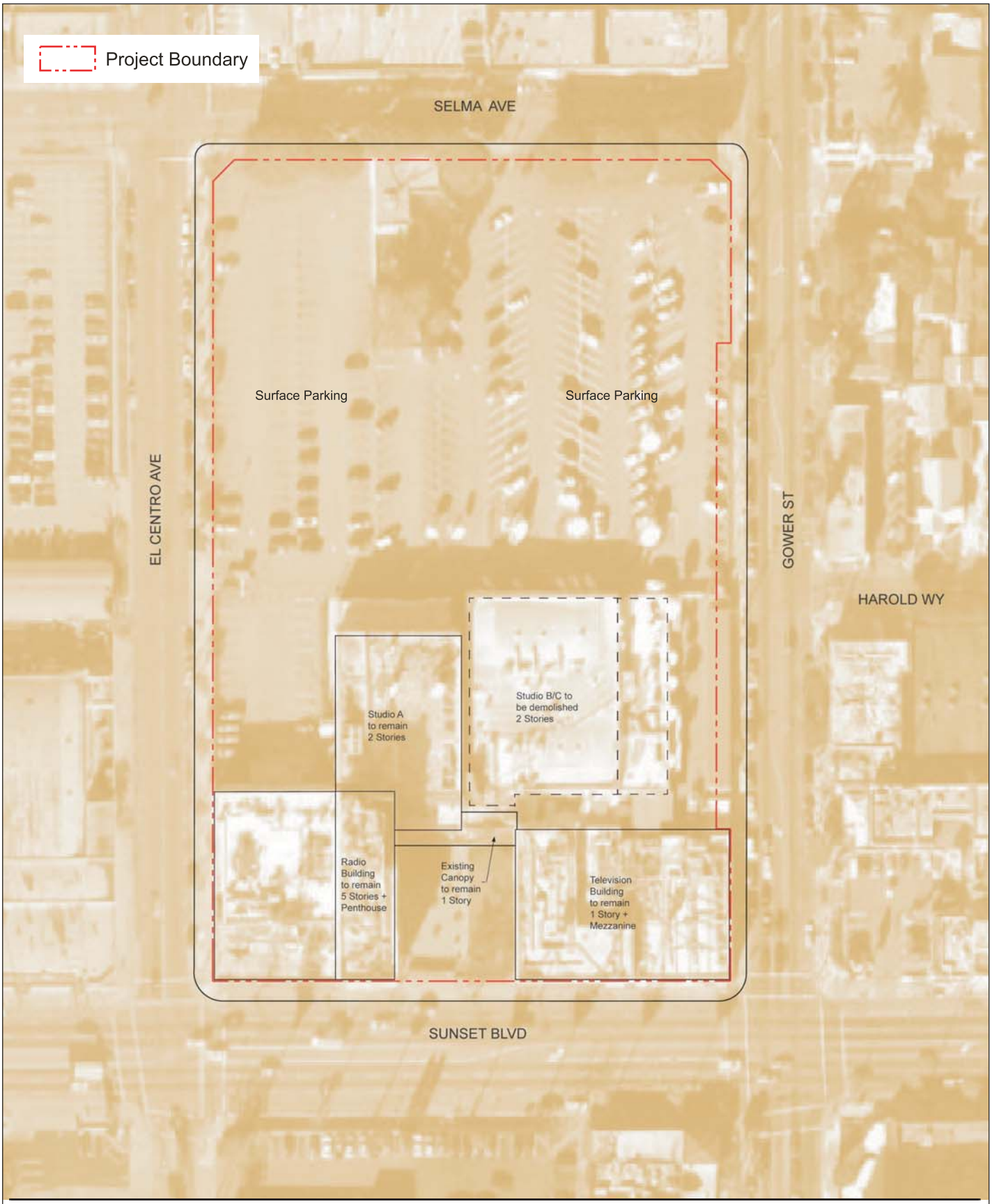
complex, located on the southern parcel of the project site, was built to include the newest and most innovative ideas in both the radio business as well as the growing television world.

The CBS Columbia Square Complex (Columbia Square Complex) was designed in an International style. Three of the buildings or wings that the complex houses, the Radio Building, Studio A, and the Television Building, were completed in 1937. The Radio Building (1st Wing) is five stories with a basement level, a mezzanine, and roof-top penthouse. Studio A (2nd Wing) is a two-story structure with a basement. The Television Building (3rd Wing) is a one-story structure with a mezzanine and a basement. A fourth building or wing, a two-story addition known as Studio B/C (4th Wing), was built directly to the northeast of the existing buildings in 1938. Studio B/C was designed by Parkinson and Parkinson.

The project site has been home to a group of radio and television studios since 1937. Radio stations KNX and KCBS-FM (formerly KNX-FM), and television station KCBS-TV (Channel 2, formerly KNXT and KTSL) have had their studios at the project site. Independent television station KCAL-TV (formerly KHJ-TV) moved to the Columbia Square Complex in 2002 from studios adjacent to CBS' then-corporate sibling Paramount Pictures, and has since relocated from the site. The CBS Television Network, originally based at the Columbia Square Complex, built a new facility to accommodate its larger production needs in Studio City in the San Fernando Valley, which opened in November 1952. In 2005, CBS began to move and consolidate its operations at the Columbia Square Complex in Hollywood to Studio Center in Studio City.

As shown in the existing site plan provided in Figure II-3 on page II-7, the project site is presently improved with four structures of the Columbia Square Complex, occupying a total of 136,233 square feet of floor area that front along Sunset Boulevard.[1] Figure II-4, on page II-8 depicts the elevations of the four existing Columbia Square Complex buildings. These buildings are currently utilized as entertainment-related, production, and post-production offices and studios. Table II-1 on page II-9 provides a floor area breakdown of the existing on-site structures.

[1] *Three structures comprising 3,079 square feet located in the northern portion of the site fronting Selma Avenue were demolished. Specifically, these included a two-story, approximately 1,594-square-foot stucco building, a single-story, approximately 878-square-foot brick garage, and a one-story 607-square-foot wood structure. At the time of the Notice of Preparation for the project, these three buildings existed on the site and were utilized as offices. Since then, however, these buildings have been demolished.*



Columbia Square

matrix environmental

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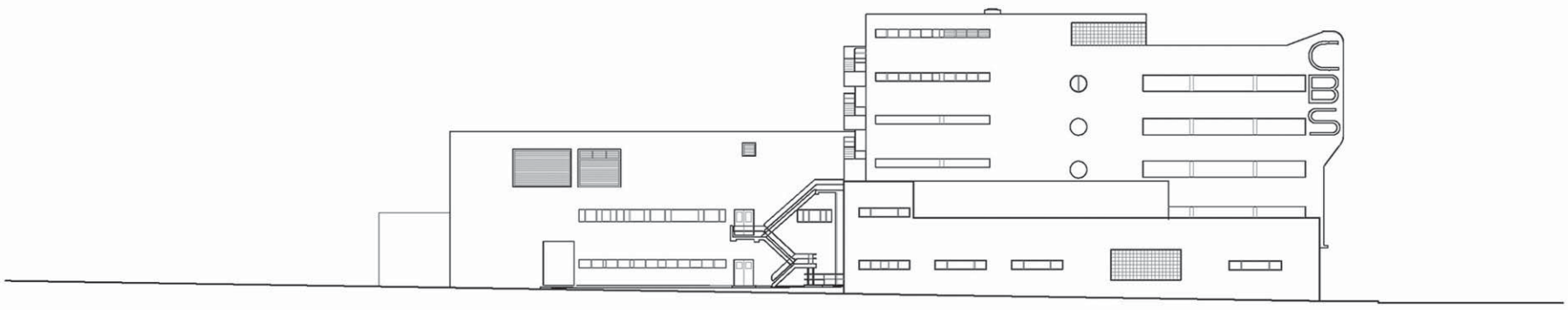
0 80 160 Feet

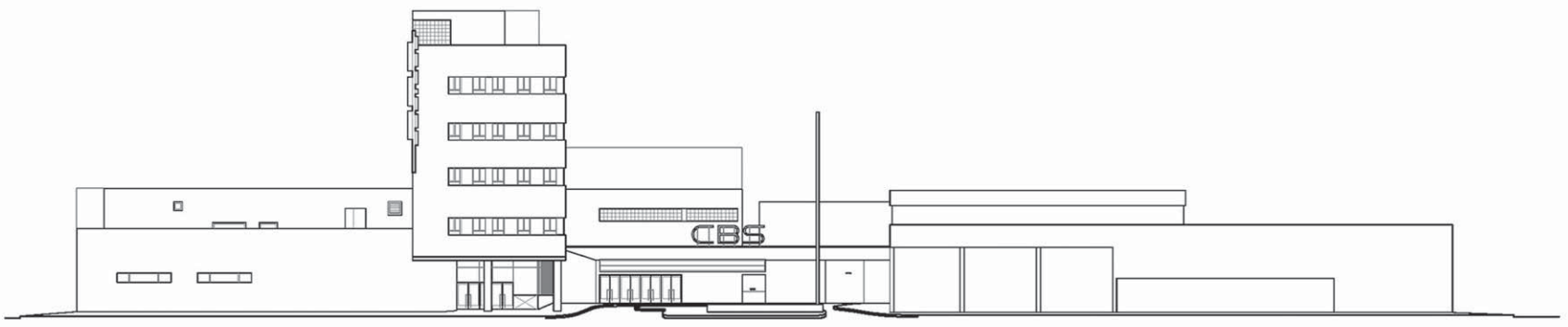
Figure II-3
Existing Aerial Site Plan

Source: Matrix Environmental, 2009

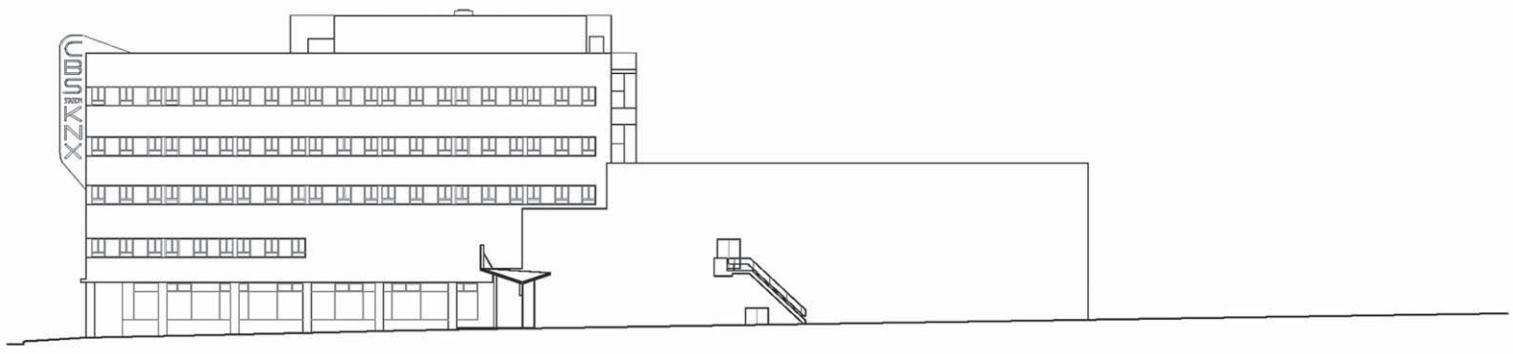


WEST ELEVATION

EXISTING WEST ELEVATION



EXISTING SOUTH ELEVATION



EXISTING EAST ELEVATION

EXISTING NORTH ELEVATION

matrix environmental

0 46 92 Feet

Figure II-4
Existing Elevations

Source: Johnson Fain International, Inc., 2008

Table II-1
Existing Buildings on the Project Site

Building/Use		Building Area
Radio Building (1st Wing)[a]		57,978 square feet
Studio A (2nd Wing)		19,102 square feet
Television Building (3rd Wing)		31,664 square feet
Studio B/C (4th Wing)		27,489 square feet
	Total Existing	**136,233 square feet**

[a] *Radio Building is comprised of two structures: the KNX Building and KNX Tower.*
[b] *At the time of the Notice of Preparation for the project, the project site included three buildings fronting Selma Avenue comprising 3,079 square feet that were utilized as offices. Since then, however, these buildings have been demolished. However, as CEQA Guidelines Section 15125 generally defines baseline conditions as those which existed at the time of the NOP, the office uses of these buildings are taken into account within this Draft EIR.*

Source: Matrix Environmental, 2009.

The remaining northern portion of the project site consists of an asphalt-paved surface parking lot. The parking lot is accessed from El Centro Avenue via a security kiosk located near the El Centro Avenue entrance and is patrolled by security 24 hours a day. The existing parking lot contains approximately 374 parking spaces. The project site also contains a planted courtyard facing Sunset Boulevard (Sunset Courtyard), and there is limited landscaping consisting of ornamental trees including fig, crabapple, lemon bottlebrush, southern magnolia, California fan palm, jacaranda, and Mexican fan palm provided primarily along the perimeter of the site. The trees are in varying degrees of health, and none of them are protected by the City's Protected Tree Ordinance. The project site is currently fenced off, with access limited to the tenants and their guests. The project site is generally flat, with a topography that gently slopes down from the north to the south.

The project site is located within the Hollywood Community Plan Area, the Hollywood Signage Supplemental Use District (HSSUD), the Los Angeles State Enterprise Zone, and the Central City Revitalization Zone. In addition, the project site is located within the Hollywood Redevelopment Project Area of the Community Redevelopment Agency, as well as the Adaptive Reuse Incentive Area. The project site is designated for "Commercial Manufacturing Industrial" land uses pursuant to the City's General Plan Framework and the Hollywood Community Plan.[2] In addition, the entire project site is zoned as [Q]C4-1VL-SN.

[2] *It should be noted that the Hollywood Community Plan is in the process of being updated.*

The "[Q]" portion of this designation indicates that a Permanent Qualified Classification condition (referred to as a Qualifying or [Q] condition) applicable to the project site is in place. Per Ordinance No. 165,662 the [Q] condition specifically prohibits "residential uses…, except as otherwise permitted in the industrial zones." The "C4" portion of this designation indicates that the project site is zoned for Commercial uses, while the "1VL" portion of this designation indicates that the project site is within a Very Limited Height District No.1, which restricts building heights to a maximum of 45 feet and three stories. The "SN" portion of this zoning designation indicates that the project site is within the HSSUD.

D. Statement of Project Objectives

Section 15124(b) of the CEQA Guidelines states that the project description shall contain "a statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the CEQA Guidelines further states "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the project is to create a fully-integrated, accessible, vertical community that enhances the City's economic base and is connected to and respectful of the existing on-site historic structures and its surrounding neighborhoods.

As set forth by the CEQA Guidelines, the project's objectives are provided below. As noted below, several of the project objectives support many of the goals, objectives, and policies set forth in the Hollywood Community Plan and the Hollywood Redevelopment Plan, which guide land use in the project area. The objectives of the project are listed within the following three categories: Community Objectives, Development and Site Design Objectives, and Economic Objectives.

Community Objectives

- 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. (Hollywood Community Plan Objective 1)

- 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. (Hollywood Community Plan Objective 2)

- To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice. (Hollywood Community Plan Objective 3)

- To promote economic well being and public convenience through encouraging the revitalization of the motion picture industry. (Hollywood Community Plan Objective 4)

- To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service. (Hollywood Community Plan Objective 6)

- To ensure that future development is compatible with existing commercial development, surrounding residential neighborhoods, and the transportation and circulation system. Developments combining residential and commercial uses are especially encouraged. (Hollywood Community Plan General Hollywood Center Policy)

- Preserve and increase employment, and business and investment opportunities through redevelopment programs and, to the greatest extent feasible, promote these opportunities for minorities and women. (Hollywood Redevelopment Plan Goal 2)

- Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors. (Hollywood Redevelopment Plan Goal 3)

- Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment. (Hollywood Redevelopment Plan Goal 5)

- Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, traffic and circulation programming, development of open spaces and other support services necessary to enable residents to live and work in Hollywood. (Hollywood Redevelopment Plan Goal 10)

- Provide a project which is fully integrated into the context of Hollywood in general and its surrounding neighborhoods specifically.

- Create a community-based, livable and walkable mixed-use development that accommodates the growth Hollywood is experiencing.

- Improve Hollywood's competitive position as a hub for regional commerce and entertainment uses and activities by offering an integration of quality services and amenities.

- Provide new high-density housing units to support an existing mature employment hub.

Development and Site Design Objectives

- Improve site access and provide sufficient parking for residents, patrons, and employees to discourage future parking on surrounding residential streets.

- Create a high quality, multi-use development that offers unique urban living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area.

- Create an integrated development with uses that provide the opportunity for people to live, work and entertain.

- Provide a design that emphasizes pedestrian and public transit opportunities, and that integrates linkages between pedestrian, public transit and the public roadways.

- Create pedestrian access from Sunset Boulevard into and through the new development to enhance walkability in the area and to connect Sunset Boulevard to the project and adjoining blocks.

- Create a more welcoming environment for the Hollywood community and millions of visitors to Hollywood, increasing the number and diversity of patrons to the cultural and commercial attractions in the Hollywood area.

- Provide variation in design elements including building planes, heights and massing within an urbanized area.

- Provide for the development of an underutilized site that is reflective of the proposed scale of the area.

- Support a pedestrian-oriented development that provides a strong presence along Sunset Boulevard.

- Realize the value of historic structures through preservation and integration into a new development with a complementary mix of uses.

- Develop a fully-amenitized residential community with state-of-the-art facilities that will serve future generations.

- Maximize site potential for office uses in an integrated mixed-use environment that will retain entertainment-related businesses historically associated with Hollywood.

- Support regional mobility goals by encouraging development in and around activity centers, thereby reducing vehicle trips and infrastructure costs.

- Improve the open space environment to the public through the enhancement of the existing courtyard along Sunset and the addition of open spaces and increased landscaping including new garden terraces and landscaped pathways.

- Preserve view corridors to and from the Hollywood Hills while aligning buildings in a way that enhances views from the buildings and the tenant and resident experience.

- Enhance the pedestrian scale and activity of the community through the development of pathways and access points.

- Enhance existing parking areas and provide additional parking with direct access to the development.

- Identify potential green building opportunities with emphasis on water conservation, increased energy efficiency and pollution reduction.

Economic Objectives

- Maximize the value of the currently underutilized site through the expansion of office uses and creation of new hotel uses.

- Add at least approximately 380,000 square feet of new office space that would attract viable tenants.

- Maximize value of the underutilized site through replacement of surface parking lots with new housing, retail uses, and restaurants consistent with anticipated market demands.

- Provide a broad range of shopping, dining and entertainment options with an outdoor experience and featured amenities to serve the needs of the nearby community as well as the region.

- Accommodate future economic expansion by providing high-density housing, hotel, office, and restaurant within a community that has the necessary infrastructure to support the development.
- Strengthen the economic vitality of the local area by attracting new workers, through construction, rehabilitation and operation of the project.
- Revitalize an existing commercial area with new development and strengthen Hollywood's competitive position within the larger Los Angeles context.
- Generate additional annual tax revenues to the City of Los Angeles, including property taxes, sales taxes, transient occupancy taxes, and gross receipts taxes.
- Create a long-term stream of additional tax revenues for the Community Redevelopment Agency.
- Provide a broad range of shopping, dining and entertainment options with an outdoor experience and featured amenities to serve the needs of the nearby community as well as the region.
- Strengthen Hollywood's economic vitality by attracting new workers, technologies and related businesses through construction, revitalization and operation of the project.
- Provide an integrated mixed-use project that is economically viable and serves the needs of the community and region.

E. Project Characteristics

PPD Gower I, LLC the Project Applicant, proposes to develop the Columbia Square Project in the Hollywood Community of the City of Los Angeles. The Columbia Square Project would provide a vertically integrated mix of uses that would assist in promoting Hollywood as a center of population, employment, retail services and entertainment. Specifically, the project would provide 400 residential units, a 125-room hotel, approximately 380,000 square feet of office space, and approximately 41,300 square feet of retail and restaurant/bar uses (including restaurant/bar use in the hotel) on a 4.68-acre site. Included within these project uses is approximately 105,510 square feet of the 136,233-square-foot Columbia Square Complex that would be rehabilitated to the Secretary of Interior Standards to provide for approximately 91,110 square feet of office uses and 14,400 square feet of retail and restaurant/bar uses. In addition, a substantial part of the project would include landscaped courtyards and pathways and other open space features connecting the various proposed uses that would establish a more pedestrian-oriented environment within the project vicinity. The project would also include

a multi-level parking facility (including three subterranean levels and six upper levels) with approximately 2,004 parking spaces. The proposed site plan for the project is provided in Figure II-5 on page II-16. In addition, Figures II-6 through II-8 on pages on pages II-17 through II-19 provide elevations and cross sections of the proposed buildings from various perspectives.

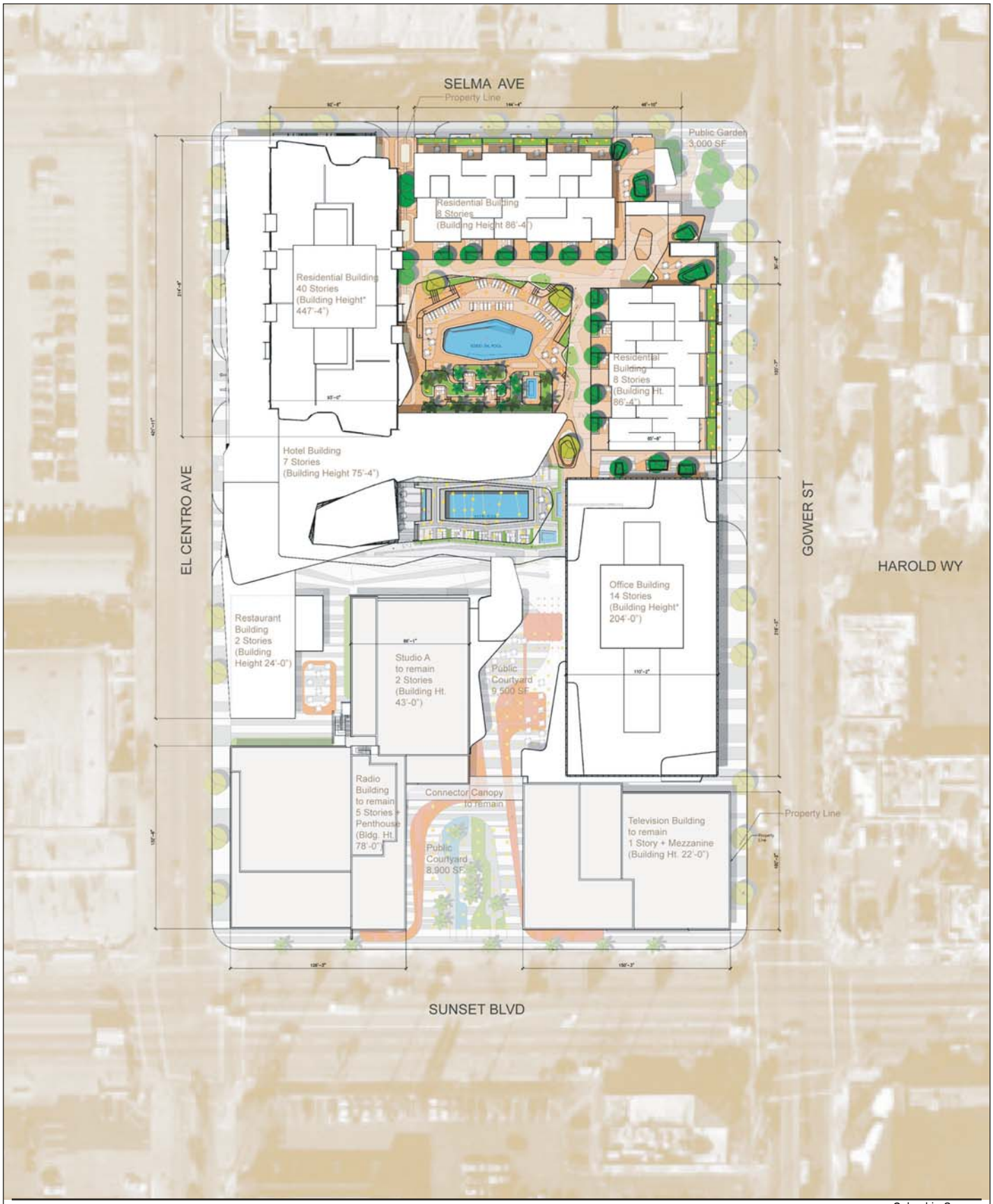
A breakdown of the existing and proposed floor areas by building/land use is provided in Table II-2 on page II-20. The following describes in greater detail the major components of the project.

1. Residential

The residential component of the project consists of 400 multi-family residential units located generally in the northern portion of the project site. The residential uses would be located within buildings ranging from eight stories to 40 stories in height sited along El Centro Avenue, Selma Avenue, and Gower Street. The majority of the residential units are anticipated to be located in the 40-story residential tower sited in the northwest corner of the project site. The top floor of the tower would reach a building height of approximately 447 feet with other elements, such as the helipad extending to approximately 487 feet and architectural features extending to approximately 512 feet. The residential units would be located within the top 33 stories of the 40-story tower, above the seven stories of hotel uses. Townhomes would be located within the eight-story structure along Selma Avenue, as well as on the top two stories (7th floor and 8th floor) of the eight-story building fronting Gower Street, above the office uses. The residential uses would comprise a total of 586,000 square feet of floor area, including lobby areas, vestibules, stairs, and residential storage. Access to the residential units would be via elevators from two resident-only pedestrian lobbies, one located off El Centro Avenue and the other off Selma Avenue. Architectural materials utilized for the residential uses would likely include items such as varying spandrel glass, clay/terracotta rain screen tiles, stainless steel cable balcony railing, and architectural smooth finish concrete.

2. Hotel

The hotel component of the project would be located along El Centro Avenue just south of and below the 40-story residential tower. The hotel would comprise the first seven stories (or approximately 75 feet) of the residential tower and include 125 rooms. The hotel would feature a small ground level lobby adjacent to a valet drop off that would provide elevators to take guests and visitors to the 7th floor (the podium level) where the main lobby



Columbia Square

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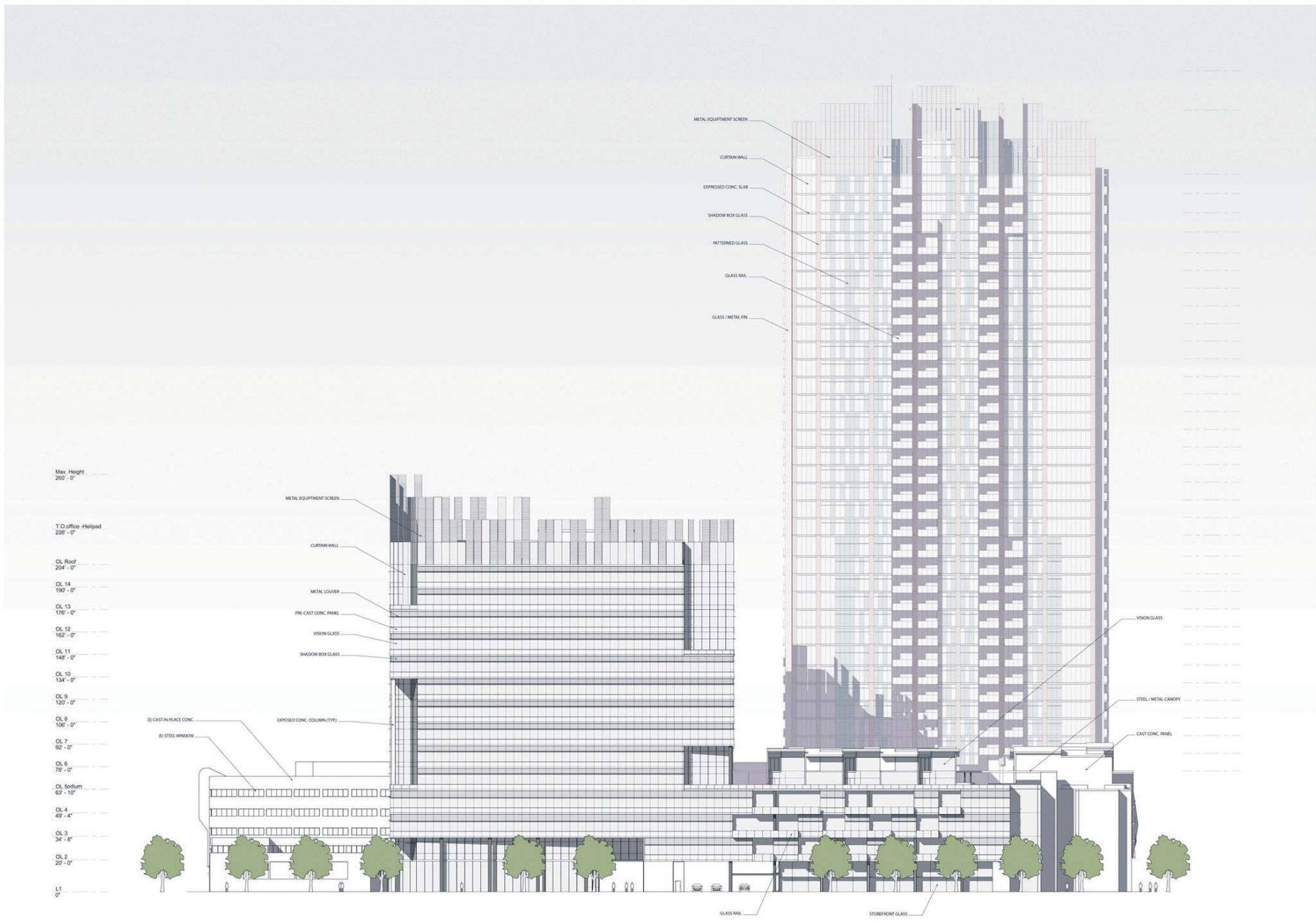
0 80 160 Feet

Figure II-5
Proposed Site Plan

Source: Johnson Fain International, Inc., 2008



East Elevation

West Elevation

Columbia Square

matrix environmental

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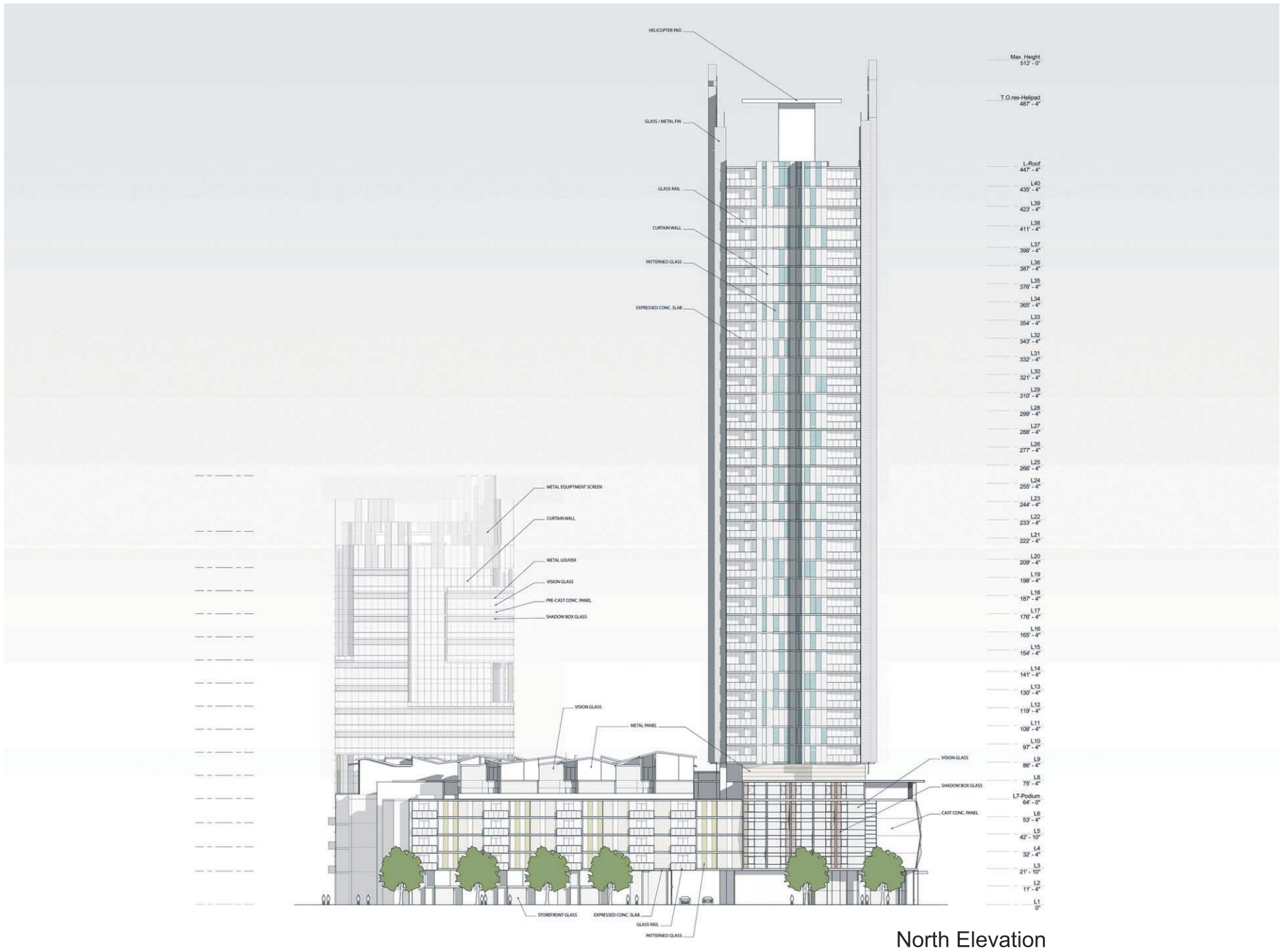
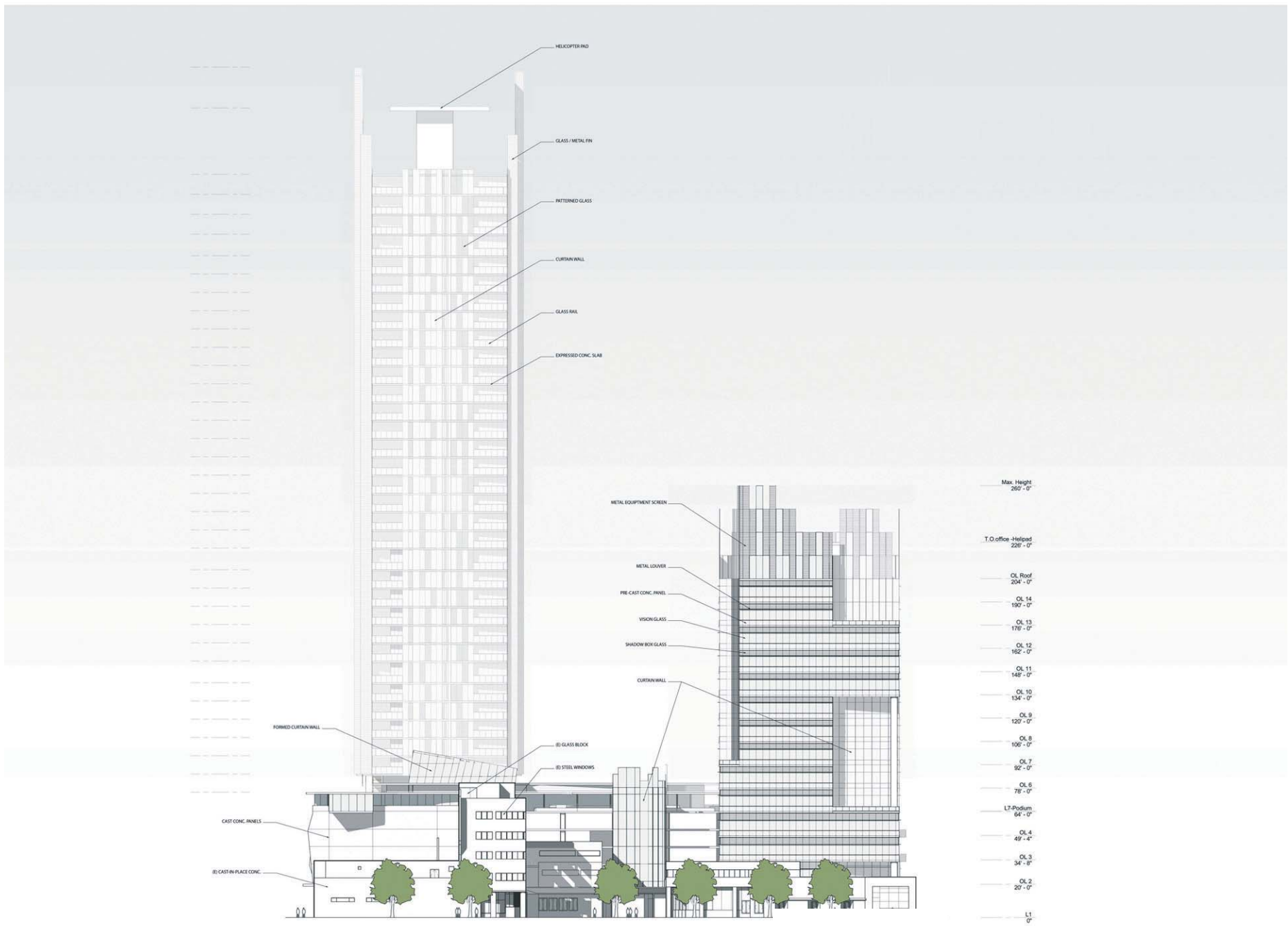
0 80 160 Feet

Figure II-6
East and West Elevations

Source: Johnson Fain International, Inc., 2008



North Elevation



South Elevation

Columbia Square

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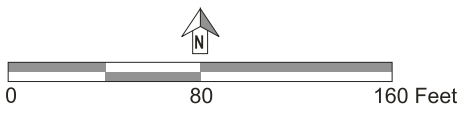
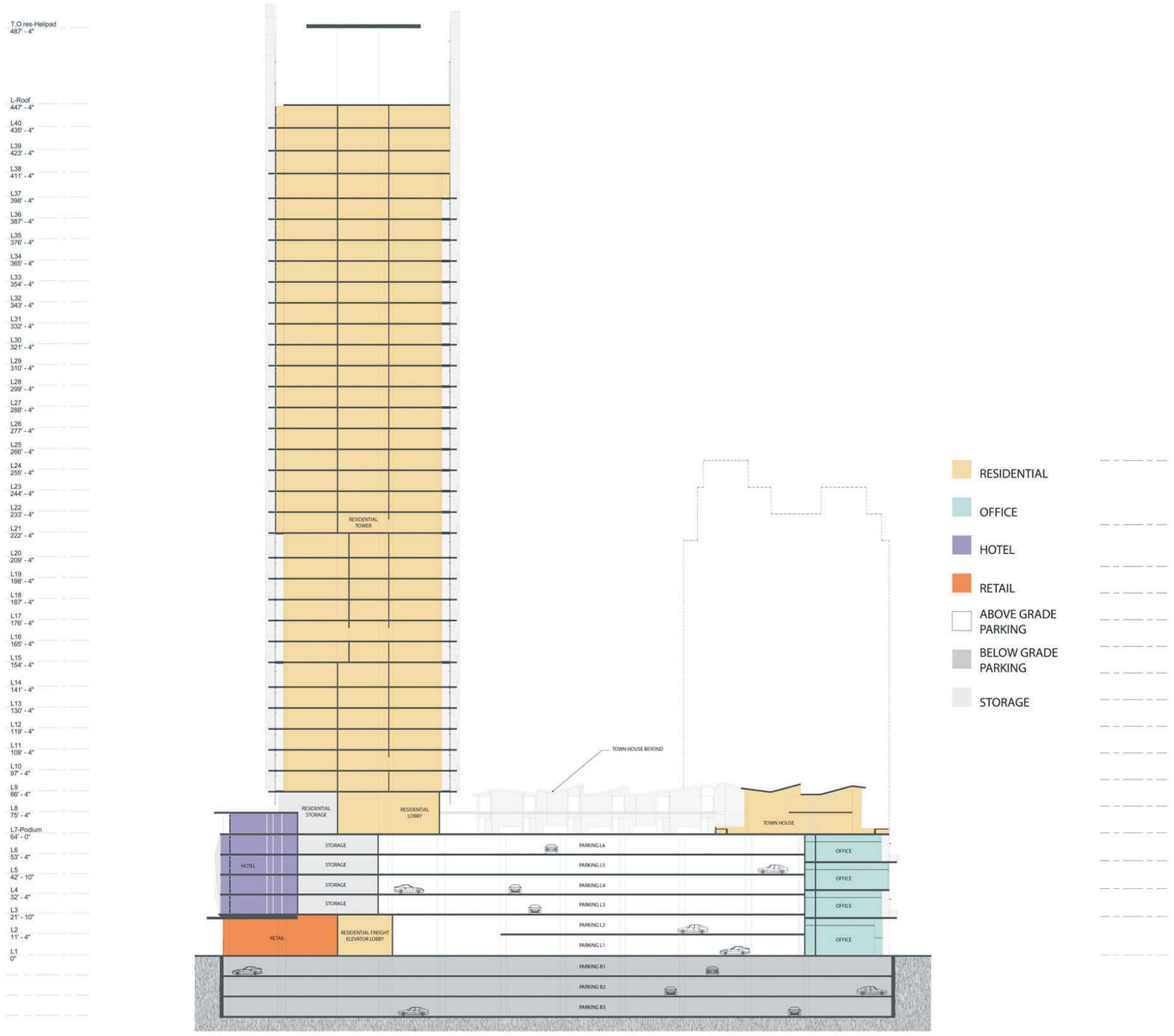


Figure II-7
North and South Elevations

Source: Johnson Fain International, Inc., 2008



Columbia Square

Figure II-8
Cross Section of Residential Tower Looking North

matrix environmental

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0 60 120 Feet

Source: Johnson Fain International, Inc., 2008

Table II-2
Existing and Proposed Land Use Summary at Project Site

Building/Use	Building Area
Existing	
Radio Building (1st Wing)	57,978 square feet
Studio A (2nd Wing)	19,102 square feet
Television Building (3rd Wing)	31,664 square feet
Studio B/C (4th Wing)	27,489 square feet
Total Existing Floor Area	***136,233 square feet***
Proposed Demolition	***30,723 square feet***
Proposed Rehabilitated Use	
Office	91,110 square feet
Retail and Restaurant/Bar	14,400 square feet
Total Rehabilitated Floor Area	***105,510 square feet***
Proposed New Construction	
Residential (400 units)[a]	586,000 square feet
Hotel (125 keys)	98,500 square feet
Office	288,890 square feet
Retail and Restaurant/Bar (including retail/restaurant within hotel)	26,900 square feet
Total New Construction	***1,000,290 square feet***
Project Total Floor Area/Floor area ratio	**1,105,800 square feet/5.42:1**

[a] *Residential units would be developed as condominiums or a combination of condominiums and apartments. However, no more than 50 percent of the units (i.e., 200 units) would consist of apartments.*

Source: Matrix Environmental, 2009.

and restaurant would be located, while the rooms would be located on levels two through six and the podium level (7th floor). Approximately 20 to 25 hotel rooms would be located on each of the floors. The hotel use would consist of approximately 98,500 square feet of floor area including ancillary uses such as the lobby, registration desk, hotel office, and laundry areas. Amenities including a swimming pool and landscaped recreational areas for the guests would also be provided on the podium level. Access to the hotel would be via the ground level or the elevator adjacent to the parking structure. Architectural materials utilized for the hotel would likely include items such as varying spandrel glass, clay/terracotta rain screen tiles, stainless steel cable balcony railing, and architectural smooth finish concrete.

3. Office

The office uses (whichwould likely include entertainment-related office and studio uses considering the project site's location in Hollywood) would be located within buildings located primarily in the southern portion of the project site along El Centro Avenue, Sunset Boulevard, and Gower Street and would range in height from one story to 14 stories. The majority of office uses would be located in the 14-story high-rise office building located in the southeast portion of the project site along Gower Street. This office building would be approximately 204 feet tall with other elements such as the helipad extending to approximately 224 feet and architectural features extending to approximately 260 feet. In addition, office uses would be located on the first six floors of the eight-story building proposed along Gower Street. As shown on Figure II-3, the existing Radio Building, Studio A, and Television Building of the Columbia Square Complex fronting Sunset Boulevard would remain and would be rehabilitated for some office uses. Overall, the project proposes approximately 380,000 square feet of office space of which 91,100 square feet would be comprised of rehabilitated office space within the existing Columbia Square Complex. The rehabilitated space would conform to the Secretary of the Interior Standards. Architectural materials utilized for the office would likely include items such as varying spandrel glass, clay/terracotta rain screen tiles, stainless steel cable balcony railing, tempered glass balcony railing, and architectural smooth finish concrete.

4. Commercial Retail/Restaurant/Bar

Retail uses and a café would be located on the ground floor of the 14-story office building. A two-story restaurant is also proposed near the southwest portion of the project site along El Centro Avenue adjacent to the hotel porte-cochere. In addition, retail and restaurant/bar uses would be provided as part of the hotel on the ground-floor and on the podium level (7th floor) of the residential tower. The location of the pedestrian-oriented retail uses and café on the ground level of the proposed office building, as well as the proposed ground level retail and two-story restaurant, would complement the off-site commercial, retail, and office uses located along Sunset Boulevard, Gower Street, and El Centro Avenue. Overall, the project proposes a total of approximately 41,300 square feet of retail and restaurant/bar space, of which 14,400 square feet would be comprised of rehabilitated retail and restaurant/bar space within the existing Columbia Square Complex.[3]

[3] *The project would include a mix of retail and restaurant/bar uses that would total 41,300 square feet. Of this 41,300 square feet, a maximum of 31,000 square feet could be developed as restaurant/bar uses.*

5. Rehabilitation of Existing Buildings

As part of the project, three of the four existing Columbia Square Complex buildings (or approximately 105,510 square feet of the 136,233-square-foot Complex) would be rehabilitated to provide for approximately 91,110 square feet of office uses and 14,400 square feet of retail and restaurant/bar uses. Rehabilitation of the Radio Building (1st Wing), Studio A (2nd Wing), and the Commercial/Television Building (3rd Wing) as well as the Sunset Courtyard would conform to the Secretary of the Interior Standards. The functionality of the rehabilitated structures would be fully integrated with that of the other structures proposed on-site, and extensive landscaping, open space, and pedestrian links would be introduced to connect and integrate all elements of the project. To this end, the project has been designed to acknowledge the history of the site while building on it for the future. The fourth building that houses Studio B/C (4th Wing) would be demolished and replaced by the 14-story office building and courtyard.

The rehabilitation of the approximately 105,510 square feet (91,110 square feet for office uses and 14,400 square feet for retail and restaurant/bar uses) of the existing 132,233 square foot Columbia Square Complex may be the subject of a separate application by the Applicant to the City. The Applicant is independently committed to rehabilitating the approximately 105,510 square foot portion of the existing Columbia Square Complex to the Secretary of Interior Standards regardless of the City's determination on this proposed project (i.e., whether the City approves this larger proposed project or not, the Applicant plans to rehabilitate a portion of the existing buildings). In an effort to be conservative, this Draft EIR analyzes the full impacts of the proposed project, which includes rehabilitation of the approximately 105,510 square foot portion of the existing Columbia Square Complex. Separate analysis of the 105,510 square foot development will also be conducted by the City for the other application for any required approvals to rehabilitate the existing Columbia Square Complex.

6. Parking and Site Access

The project would include a nine-level parking facility with approximately 2,004 parking spaces located within the central portion of the site. The three lower levels of the parking facility would be subterranean, while the upper levels would begin from ground level and form the podium upon which the residential tower and townhomes would be located (the podium level would thus comprise the 7th floor of proposed development). The parking facility would be physically integrated with surrounding development within the interior of the site such that it would be surrounded by the residential tower to the west, the townhomes to the north, the office and townhomes to the east, and the existing buildings to the south and therefore, would generally not be visible from surrounding areas.

Vehicular access to the parking facility would be provided at El Centro Avenue, Selma Avenue, and Gower Street. The vehicular access driveways along Gower Street would not align with Harold Way, which provides access to neighborhood residential uses adjacent to the project site. A porte-cochere with valet service for hotel guests would be provided off of El Centro Avenue with an entrance driveway from El Centro Avenue at the south end of the porte-cochere and an exit driveway to El Centro Avenue at the north end of the porte-cochere. Hotel valets would take cars down to the subterranean level of the parking facility via a ramp at the north end of the porte-cochere and would return cars from the parking facility via a ramp at the south end of the porte-cochere. Segregated residential parking would be provided on the lower three subterranean levels accessed from El Centro Avenue via the ramp at the south end of the porte-cochere (for residential entry) and the ramp at the north end of the porte-cochere (for residential exit). A residential drop-off zone would be provided within the ground level of the parking facility near the Selma Avenue driveway. The Gower Street driveway would be right-in/right-out only and would provide access to the second aboveground level of the parking facility via a ramp for office employees. Valet service for office visitors and retail patrons would be provided on the ground level. The right-in/right-out only on Gower Street would help to reduce the number of vehicles intruding on neighborhood streets.

Additionally, the new Sunset Courtyard would be provided midpoint along Sunset Boulevard allowing pedestrian access to the project site.

A loading area serving the commercial uses would be provided on the ground level of the parking facility. Trucks would enter via the Selma Avenue driveway head first, back into the loading areas for the office and retail spaces, and then exit via the Gower Street driveway head first. A loading and trash pick-up area serving the residential uses would be provided on the northwest corner of the project site along Selma Avenue (the same driveway described above to access the parking structure). Trucks would enter the project site head first, back into the loading or trash pick-up area for the residential uses, and then exit back to Selma Avenue head first. The design of both these areas minimizes potential traffic impacts on Gower Street and Selma Avenue as trucks would turn around within the project site and would not back into or out of the project site on public streets.

7. Architectural Design and Materials

The project would be designed to provide visual interest through variations in building height, bulk, massing, and design. The site layout and architectural style of the new structures, featuring clean lines and a contemporary urban architecture, are intended to complement the Columbia Square Complex buildings that would remain. The project design also reflects a transition in building height with regard to the existing historic structures and the surrounding neighborhood's character. The transitional heights of the project would maintain the existing low-rise buildings in the southern portion of the site,

permit mid- to high-rise buildings throughout the central and northern portions of the site, and concentrate the tallest component of the project in the northwest corner of the site, furthest from Sunset Boulevard, the remaining Columbia Square Complex buildings, and existing off-site residential uses to the east. The location of the office tower, situated behind (north of) one of the existing Columbia Square Complex buildings on Sunset Boulevard, would retain and respect the project site's historic façades along Sunset. Additionally, the driveways along Gower Street would not align with Harold Way to the east, thus discouraging project traffic from using the nearby residential streets to access the site. Further, the project would align the proposed buildings in a way that permits a variety of long-range views for building occupants.

The proposed buildings would be treated with contrasting but complementary colors, building plane variations, a variety of building materials, planters, and other landscape elements. Multiple surface reliefs and architectural extensions would also be incorporated into the buildings' façades, including parapets and varied rooflines. Architectural materials may include varying spandrel glass, clay/terracotta rain screen tiles, stainless steel cable balcony railing, and architectural smooth finish concrete. In addition, rooftop screening features would be used to obscure rooftop equipment such as mechanical structures, satellite dishes, and the required helipad from view.

8. Project Design Features

(a) Recreation, Open Space, and Landscape Plans

The project would provide substantial open space, landscaping and amenities for project residents, guests and tenants, as well as for the general public. Publicly accessible landscaped open space would consist of two public courtyards and a pocket park located on the ground level. One of the public courtyards would consist of the existing courtyard (the Sunset Courtyard) fronting Sunset Boulevard that is a part of the Columbia Square Complex. As part of the project, this courtyard would be renovated, re-landscaped, and reintroduced as a new pedestrian-oriented amenity for the greater community. More specifically, the courtyard would connect to other green spaces on-site and create a walkable district, enabling residents and visitors to walk through and enjoy a vast majority of the project site. The second courtyard would be located at the northwest corner of the site and would be enhanced with pedestrian pathways and accent paving. The pocket park would be located in the northeast corner of the project site (at the corner of Selma Avenue and Gower Street). Additional amenities for project residents and/or guests would include fitness and recreation rooms, large central courtyards and gardens on the podium level, two swimming pools, entertaining patios, sunning areas, and landscaped recreational areas. Overall, the project would provide a total of approximately 76,400 square feet of open space consisting of approximately 59,000 square feet of active and passive common open space and approximately 17,400 square feet of private open space amounting to

approximately 40 percent of the project site.[4] The project would create a walkable community, enabling residents and visitors to walk through and enjoy the project site.

Figures II-9 and II-10 on pages II-26 and II-27 depict the landscape plans for the ground level and the podium, respectively. Landscaping including ornamental trees would be provided along the perimeter of the site as well along pedestrian walkways integrated throughout the project site. In addition, the courtyard along Sunset Boulevard, as well as the podium level adjacent to the two proposed pools would be landscaped. As shown in Figure II-9, the ground level of nearly all of the buildings provides pedestrian links to the surrounding environs, as well as to the interior common recreation areas. Multiple access points and a mix of landscaped public and private open space, including several large courtyards and the pocket park, would connect and integrate all elements of the project. Pathways would be defined and open to pedestrians traversing the block or connecting to elements within it. The proposed landscape plans would provide for an estimated 19 percent increase in landscaped area on-site compared to existing conditions, thereby increasing green space and pervious surface area.[5]

(b) Signage and Lighting

As mentioned previously, the project site is located within the HSSUD. The HSSUD was enacted to acknowledge and promote the continuing contribution of signage to the distinctive aesthetic of Hollywood Boulevard, as well as control the blight created by poorly placed and badly designed signs throughout the Hollywood area. The project includes a signage program designed to be aesthetically compatible with the existing and proposed architecture of the site and other signage in the area. Proposed signage would include general ground level and wayfinding pedestrian signage, as permitted per the HSSUD and the Community Redevelopment Agency's Design for Development for Signs in Hollywood. In addition, the seven existing backlit wall signs attached to the Columbia Square Complex buildings would be retained, relocated, and/or replaced on-site.[6] Thus, the project would include seven 240-square-foot (24 feet wide by 10 feet tall) internally illuminated signs, also

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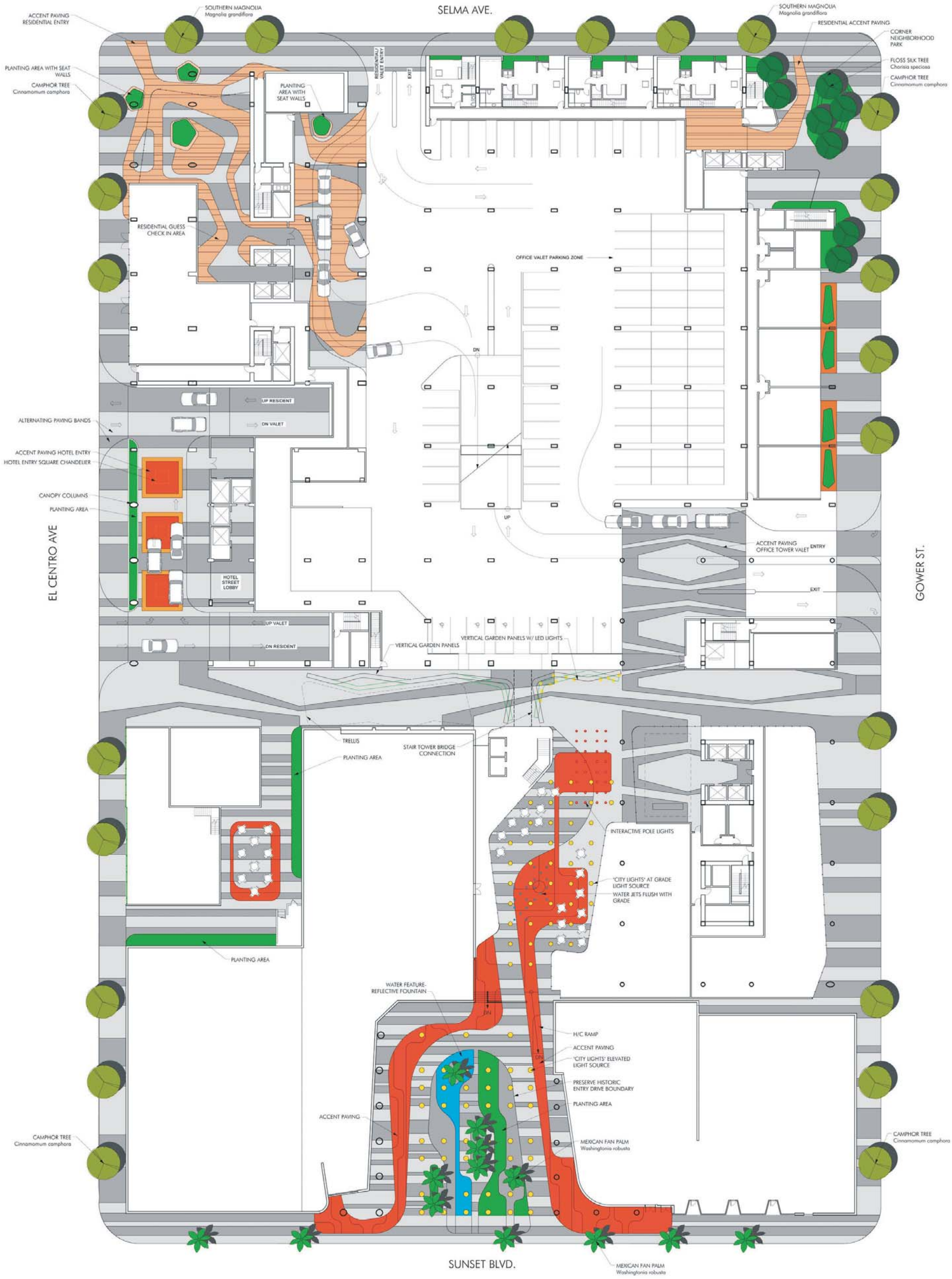
[4] *Open space is based on the definition of open space provided in Section 12.21 of the LAMC and includes common and private open space areas. Please refer to Section IV.G.5, Parks and Recreation, for further discussion.*

[5] *This increase takes into account landscaping/pervious open space both on the ground level (22,210 square feet or approximately 11 percent of the lot area) and the podium level (19,970 square feet or approximately 10 percent of the lot area), for a project total of 42,180 square feet of potentially pervious landscaping or approximately 21 percent of the total project site area. The project site currently includes 1.8 percent of pervious landscaping. Thus, the project would result in an estimated 19 percent increase in landscaped area on-site.*

[6] *Any relocation of existing signage would occur pursuant to Section 8 of the HSSUD.*



Columbia Square

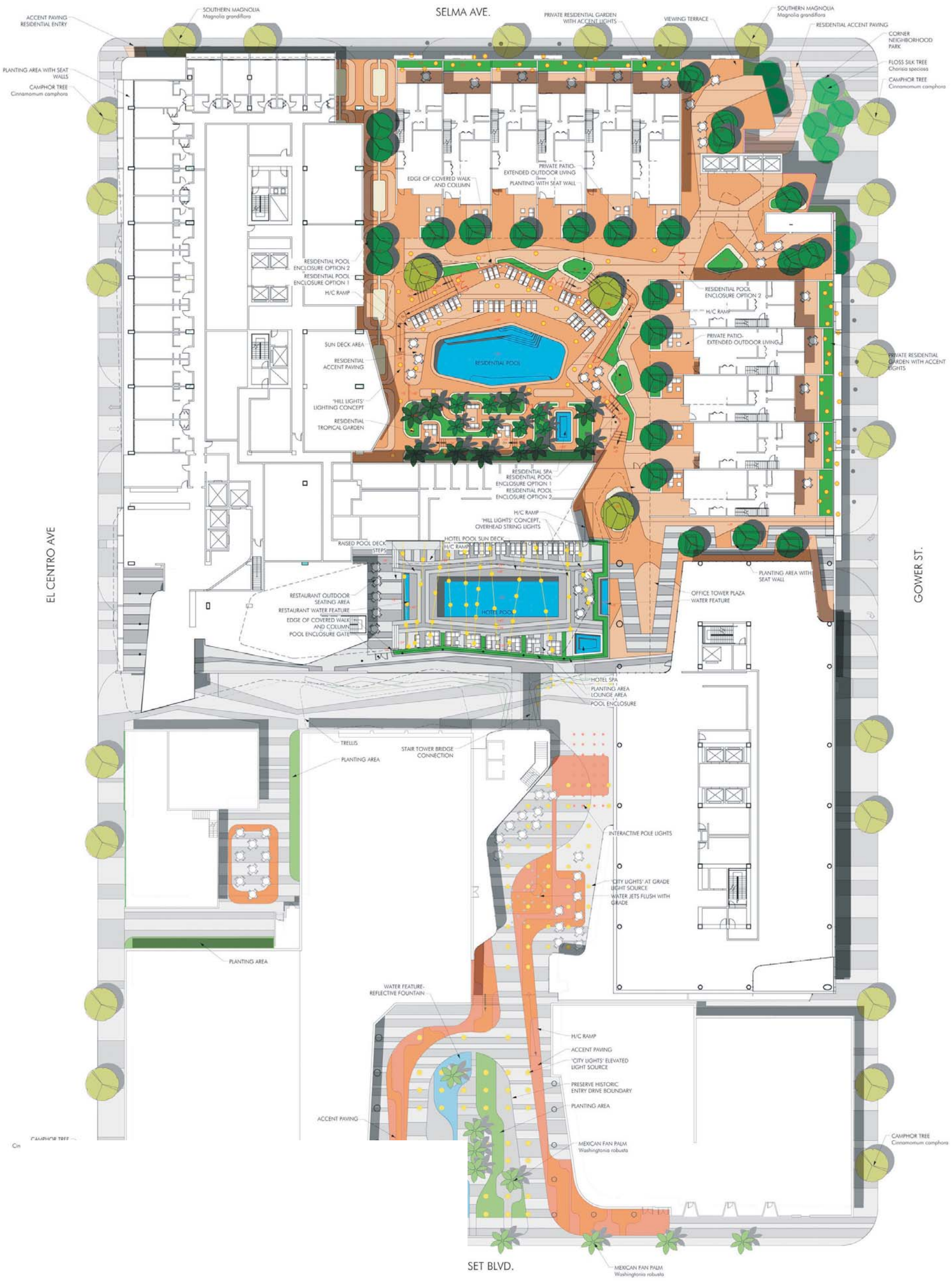
matrix environmental

N

No scale

Figure II-9
Landscape Plan - Ground Level

Source: Johnson Fain International, Inc., 2008



Columbia Square

matrix environmental

N

No scale

Figure II-10
Landscape Plan - Podium Level

Source: Johnson Fain International, Inc., 2008

consistent with applicable requirements. The existing 53-square-foot pole sign located on-site would be removed as part of the project. The seven 240 square foot signs would be well within the permitted area of four square feet per foot of street frontage, which allows for approximately 7,500 square feet of signage on-site. In addition, an artistic wall element may be introduced along the southern façade of the proposed hotel.

Project lighting would include low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. In addition, outdoor lighting, such as klieg lights associated with future studio uses could be utilized on occasion at the site. Low level lighting to accent signage, architectural features, and landscaping elements would also be incorporated throughout the site. On-site exterior lighting would be shielded or directed toward areas to be lit to limit spill-over onto adjacent residential uses. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

(c) Security Features

During construction, the project site would be fenced to prevent public entry and theft. Furthermore, a Construction Staging and Traffic Management Plan would be implemented and project contractors would coordinate with the LAPD to ensure emergency response access to the project site is maintained.

During operation, the project would incorporate state-of-the-art security features to provide for the safety of its residents, employees, and visitors. These features would include the provision of on-site security guards, controlled parking and building access, and closed circuit television (CCTV) cameras to monitor the open space, parking structure, building entrances, elevators, loading dock, and perimeter areas around the building and parking structure. It is anticipated that the residential and office buildings would include a security console in the lobby where security guards would monitor the CCTV cameras, control access to the building, and coordinate with other on-site security, as needed. Security personnel would patrol the parking structure and exterior common areas on a regular basis. A minimum of two security personnel would be on duty twenty-four hours a day, seven days a week. Initial alarms, such as intruder alarms or duress alarms would be responded to by on-site security. Site security would call the Los Angeles Police Department as necessary.

(d) Fire Safety Features

During project construction, construction managers and personnel would be trained in emergency response and fire safety operations. Fire suppression equipment specific to

construction would be maintained on-site in accordance with OSHA and Fire Code requirements. Additionally, traffic management personnel (flag persons) and appropriate detour signage would be employed as necessary to ensure emergency access to the project site and traffic flow on street right-of-ways is maintained.

For fire safety during operation, the project would incorporate building design features that would comply with applicable LAMC fire safety requirements, including LAMC Chapter 9 (Building Code) and Chapter 7 (Fire Code). Fire safety design features would include and are not limited to the following: fire-resistant building materials, emergency and fire control elevator in each bank of elevators, a fire alarm system throughout the buildings, a standby emergency power system, smoke detection systems in all residential and public areas, fire safety signage on all floors, a separate Fire Control Station, automatic sprinkler systems, and a rooftop emergency helicopter landing facility for the residential and office high-rise buildings. Further, a plot plan would be submitted to LAFD for approval prior to the recordation of the final map or the approval of a building permit. The plot plan would include the following minimum design features:

- No building or portion of a building would be constructed more than 150 feet from the edge of a roadway, of an improved street, access road, or designated fire lane, unless otherwise approved;
- Access for LAFD apparatus and personnel to and into all structure structures would be provided;
- Locations and sizes of all fire hydrants; and
- All structures would be within 300 feet of an approved fire hydrant.

(e) Air Quality and Noise Management

The project would implement good housekeeping practices (e.g., maintenance and inspections of ventilation hood systems, grease interceptors, etc) to minimize the release of odors from restaurant uses with odor reducing equipment as necessary. In addition, garbage collection areas for the project would be covered and situated away from the property line and sensitive uses. Good housekeeping practices would be sufficient to prevent nuisance odors.

All building outdoor mounted mechanical and electrical equipment for the project would be designed to meet the noise requirements of LAMC, Chapter XI, Section 112.02. In addition, all outdoor loading dock and trash/recycling areas would be fully or partially enclosed such that the line-of-sight between these noise sources (loading dock service area) and any adjacent noise sensitive land use would be obstructed.

(f) Sustainable Design Features

The project would be designed and constructed in a manner consistent with the requirements needed to achieve a Silver rating from the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)® program. The following features would be implemented to achieve a LEED® Silver rating:[7]

(1) Energy

- Exceed Title 24 (2007 California Building Standards Code) baseline standard requirements for energy efficiency by 14 percent through such design methods and technologies as centralized chiller plant with rooftop ventilation, high performance glazing on windows, solar hot water generation, appropriately-oriented shading devices, high efficiency boilers, cogeneration, and enhanced insulation to minimize solar and thermal gain. These design features would reduce the project's heating and cooling loads, thus reducing the greenhouse gas emissions associated with necessary energy inputs.

- Apply energy-saving technologies and components to reduce the project's electrical use-profile. Examples of these components include compact fluorescent light bulbs (CFL), energy saving lighting schemes such as motion-detection controls (where applicable), and energy efficient heating and cooling equipment.

- Commissioning of building energy systems to verify that the project's buildings energy systems are installed, calibrated, and performed to the Applicants' project requirements.

- Each component of the project would incorporate strategies to mitigate the heat island effect.[8] The project would install roofing materials with cool roof membranes in accordance with LEED® requirements. The project would also integrate non-roof strategies by placing 100 percent of parking spaces underground. By mitigating the heat island effect around the project site, the project would lower its air conditioning demand, and thus its peak energy usage.

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[7] *The project is registered for the US Green Building Council's LEED program.*

[8] *The term "heat island effect" refers to the difference in microclimate between built up and rural areas. City temperatures, as result of the heat island effect, are higher than their surrounding areas. According to the US EPA, heat islands can cause increased summertime peak energy and air conditioning demand, and thus their associated air pollutant and GHG emissions.*

- A central electronic metering network and sub-metering capability will be included in the base building design. Future tenants will be able to utilize this resource to creating their own metering and verification system.

(2) Air Quality

- Participation in fundamental refrigerant management to preclude the use of chlorofluorocarbons (CFCs) in HVAC systems for the project's residential and hotel uses.

- Use of adhesives, sealants, paints, finishes, carpet, and other materials that emit low quantities of volatile organic compounds (VOCs) and/or other air quality pollutants.

(3) Alternative Transportation Strategies

- Preparation and implementation of a Transportation Demand Management (TDM) Plan that would promote the use of alternative transportation, such as mass-transit, ride-sharing, bicycling, and walking to reduce project trips and and/or vehicle miles traveled.

- Provision of on-site bicycle storage for residents, customers, and employees.

- Allocation of preferred parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.

(4) Stormwater Management

- Reduce stormwater runoff through the introduction of new landscaped areas throughout the project site. The newly landscaped areas would represent an approximate 21 percent increase in pervious surfaces when compared with existing conditions.

- In compliance with the National Pollutant Discharge Elimination System (NPDES) and City requirements, Best Management Practices (BMPs) would be implemented to address water quality issues during both construction and operation of the project. Construction BMPs would include but not be limited to proper scheduling to avoid mass grading during the rainy season; covering materials such as bags of cement, paint, etc.; designating wash pits for washing paint, stucco, etc.; berming the site to control effluent from leaving a site during a rain event; and establishing sediment traps. For operation of the project, a

Standard Urban Stormwater Mitigation Plan (SUSMP) would be prepared which would specify operational BMPs to be implemented. Operational BMPs would be designed to infiltrate and filtrate the first 0.75 inches of on-site stormwater runoff in accordance with City requirements. Furthermore, the project's stormdrain system would be designed such that post-development flow rates at each drainage point would not exceed the pre-development flow rates.

(5) Water Conservation

- Achieve a minimum 20 percent water use reduction through water conservation measures.
- Use of water conservation measures including bathroom and kitchen faucet aerators, high-efficiency clothes washers and dishwashers at a 6.0 water efficiency factor, high-efficiency toilets and waterless urinals for office, hotel, and retail/restaurant uses.
- Utilize an efficient irrigation system, including rotating sprinkler nozzles for landscape irrigation and weather sensitive landscape timers.

(6) Waste Management

- Divert at least 75 percent of construction and demolition debris from project construction from landfills.
- Provide various locations on-site for the collection and storage of recyclable materials.
- Utilize building materials with 20 percent as recycled-content building materials for the construction of the project uses.[9]
- Rehabilitate and reuse a portion of the existing buildings located on-site.

[9] *This LEED 4.1 credit requires the use of building materials with recycled content such that the sum of post-consumer recycled content plus one-half of the pre-consumer recycled content constitutes at least 20 percent of the total value of the total building materials in the project.*

9. Construction Phasing and Activities

To accommodate the proposed uses, Studio B/C (4th Wing) would be removed and approximately 105,510 square feet of existing floor area of the Columbia Square Complex located in the southern portion of the project site would be rehabilitated to conform to the Secretary of the Interior Standards. Project implementation would result in approximately 30,723 square feet of demolition and the construction of approximately 1,000,290-square feet of floor area contained within a number of new multi-story structures on the project site.

The construction schedule for the project would be approximately 48 months from the start of grading and excavation activities to the receipt of certificates of occupancy. It is anticipated that construction of the project would occur over a 48-month period beginning in 2009 with completion in 2013. Construction would occur in four phases including: 1) demolition, 2) site preparation and excavation, 3) building construction, and 4) building finishes. Project construction activities would commence with the demolition of approximately 30,723 square feet of existing structures. This phase is expected to occur over approximately four to six months. The grading and excavation activities would occur over approximately four to six months. Construction of the proposed buildings would occur over a two-year period, with building finishes occurring over 12 months. In accordance with the LAMC, construction activities would be limited to 7:00 A.M. to 9:00 P.M., Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturdays and holidays. No construction activities would occur on Sundays. Most, if not all, truck trips would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) to minimize generating truck trips during the p.m. peak hours.

During construction, approximately 190,000 cubic yards of soil would be exported. Construction vehicles would access the site from Sunset Boulevard via the US-101 Freeway. Project construction would comply with SCAQMD Rule 403 which requires implementation of best available dust control measures during construction activities which generate fugitive dust, such as earth-moving activities, grading, demolition and equipment travel on unpaved roads. Dust control measures include frequent application of water or chemical surfactants, providing dirt track-out prevention devices, covering stockpiles and sweeping of streets adjacent to the construction site. In addition, project construction contractor(s) would comply with CARB's Airborne Toxic Control Measure (ATCM), which limits heavy duty diesel engines from idling for more than 5 minutes at any given time. ATCM applies to diesel powered vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered, and would thus apply to the heavy duty diesel vehicles idling at the project site. To minimize construction noise, project contractor(s) would equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards.

F. Necessary Approvals

In order to implement the project, various permits, approvals, and actions are required by the City of Los Angeles and other responsible agencies. City departments, commissions, and councils that may use this EIR in their decision-making process include the Los Angeles Redevelopment Agency, the Department of Building and Safety, the Planning Department, the Department of Pubic Works, the Planning Commission, and the City Council. Other agencies include Regional Water Quality Control Board and the South Coast Air Quality Management District. Approvals required for the project would include, but may not be limited to, the following:

- Community Redevelopment Agency Board Approval to develop up to 5.42:1 FAR.
- Community Redevelopment Agency Board approval of an Owner Participation Agreement (OPA) to permit development in excess of a 4.5:1 FAR.
- City approval of a Development Agreement.
- General Plan Amendment to amend the existing Hollywood Community Plan land use designation for the site from "Commercial Manufacturing" Industrial to the "Regional Center" Commercial land use designation; and pursuant to Hollywood Community Plan Footnote 9, permit a floor area ratio of 5.42:1**.**[10]
- Vesting Zone Change from [Q]C4-1VL-SN to C4-2-SN Zone.
- Height District Change to permit Height District Number 2, in lieu of Height District 1VL.
- Vesting Conditional Use Permit (CUP) to permit the following:
  - Motion picture and television studios and related incidental uses in a C4 Zone.
  - A hotel within 500 feet of an R Zone.
  - Live entertainment/patron dancing.
  - On- and off-site sales and consumption of a full line of alcoholic beverages.

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[10] *The Hollywood Community Plan is currently in the process of being updated. Upon completion and approval of the update, the project may require a General Plan Amendment pursuant to the Community Plan's policies with regard to Section 506.2.3 of the Hollywood Redevelopment Plan in lieu of the approval with respect to Footnote 9.*

- Site Plan Review to allow a development project that creates 50,000 gross square feet or more of nonresidential floor area, creates an increase of 50 or more dwelling units, or adds 1,000 or more average daily trips.
- City Planning Commission approval to allow a Phased Development that will be constructed in consecutive or overlapping phases over a 10-year period.
- Zone variance to allow a restaurant with an outdoor eating area not on the ground floor.
- Vesting Tentative Tract Map.
- Demolition, grading, excavation, foundation, and associated building permits.
- Haul Route Approval.
- Encroachment Permit to encroach approximately 5 feet underneath Gower Street to construct a portion of the parking structure.
- Signage approvals pursuant to the guidelines and policies of the Hollywood Signage Supplemental Use District.
- Certification of an Environmental Impact Report and adoption of a Mitigation Monitoring and Reporting Program.
- Coverage under the National Pollution Discharge Elimination System (NPDES) Permit by the Los Angeles Regional Water Quality Control Board.
- Issuance of all required ministerial permits necessary to implement the project (e.g., grading, building, certificate of occupancy, water, sewer, storm drain, etc.) by the City of Los Angeles.
- Any additional actions as may be deemed necessary.

III. Environmental Setting

III. Environmental Setting

A. Overview of Environmental Setting

The following is a summary of the general environmental setting on and around the project site. More complete and specific discussions are contained under each respective section, as presented in Section IV of this EIR.

1. Aesthetics, Views, Light/Glare, and Shading

a. Aesthetics/Visual Quality

Located within Hollywood, the historic center of the entertainment industry, the project site is situated in a highly urbanized area that includes a mix of commercial, entertainment, office and residential uses. The project site consists of approximately 4.68 acres comprising the block bound by Selma Avenue to the north, Gower Street to the east, Sunset Boulevard to the south, and El Centro Avenue to the west. Encompassing the existing Columbia Square Complex, the project site is currently developed with several buildings containing television studio and related office uses, all of which are located in the southern portion of the project site fronting Sunset Boulevard and/or situated around an outdoor courtyard along Sunset Boulevard. The Columbia Square Complex was designed in an International architectural style and includes four concrete buildings ranging in height from one to five stories. Currently, all of the Columbia Square Complex buildings have a stucco finish painted a dusty rose color, and several wall signs are located along the unarticulated building façades at the intersections of Sunset Boulevard/El Centro Avenue and Sunset Boulevard/Gower Street.

The existing Columbia Square Complex buildings are considered historic resources under CEQA. The buildings appear eligible for listing on the National Register of Historic Places (National Register) and the California Register (California Register) of Historical Resources due to their association with the development of radio and television in the United States and their importance as major components of the entertainment industry in Hollywood. Additionally, the buildings serve as excellent examples of International Style architecture in Los Angeles and as representative works of master architect William Lescaze and the architectural firm of Parkinson & Parkinson. The Los Angeles City Council has designated the Columbia Square Complex a City of Los Angeles Historic-Cultural Monument.

The remainder of the project site is developed with surface parking, which is accessed from El Centro Avenue, with limited landscaping along the site perimeter in the form of ornamental, non-native/non-protected trees and hedges. Together, the existing on-site buildings represent approximately 136,233 square feet of building area.

The project vicinity is highly urbanized and built out with predominantly low- to mid-rise buildings. The area includes a mix of office, commercial and entertainment uses, including motion picture and television studio/production uses, as well as residential uses. While the area contains a number of historic resources (described further below), it has been undergoing a substantial transformation in recent years, and new and ongoing development in the vicinity includes dense mixed uses with mid- and high-rise buildings. While the project site and environs are generally flat, with a topography that gently slopes down from north to south, the Hollywood Hills to the north are a distinctive component of the Hollywood urban skyline.

b. Views

Within the project area, Hollywood Boulevard and Sunset Boulevard are designated as Major Scenic Highways in the Hollywood Community Plan.[1] Hollywood Boulevard provides views of the urban streetscape, which includes the historic buildings within the Hollywood Boulevard Commercial and Entertainment District. Sunset Boulevard also provides views of an urban streetscape with a number of historic and potentially historic buildings, including the Cinerama Dome, Hollywood Palladium event venue, and the on-site Columbia Square Complex. In addition, the Selma-La Baig Historic District and its contributing structures are considered valued visual resources. Within the project site, the existing Columbia Square Complex, described above, is considered to be a visual resource, particularly from Sunset Boulevard. Visual resources of merit in the greater project area include the Hollywood Sign, a City-designated historic monument, and the Hollywood Hills located to the north, as well as a number of historic buildings. In particular, the Hollywood Sign and surrounding hills provide an important scenic backdrop to large portions of the metropolitan Los Angeles area, inclusive of views of and near the project site.

c. Light/Glare

The project vicinity is home to numerous nightclubs, theaters, restaurants, and bars. Lighting from these land uses contribute to the high ambient nighttime light levels that

[1] *Based on the Hollywood Community Plan map dated September 1991.*

characterize the area. Exterior light sources include lighting for signage, architectural highlighting, parking lot visibility, and security purposes, as well as pole-mounted street lights along adjacent streets and light generated by vehicular traffic on local streets, especially Sunset Boulevard. Interior light spill-over from windows of nearby commercial and residential uses also contributes to the ambient nighttime levels. In the immediate vicinity of the project site, land uses sensitive to nighttime light include the existing residences located to the east across Gower Street. Light levels generated within the project site are low to medium, as the Columbia Square Complex buildings do not have brightly lit façades or entrances, with the exception of backlit wall signs attached to the Columbia Square Complex buildings near the intersections of Sunset Boulevard/El Centro Avenue and Sunset Boulevard/Gower Street. Light sources on the site also include exterior security lighting and pole-mounted lighting in the surface parking lot.

Sensitive receptors relative to glare include the existing residential uses to the east and motorists traveling on Sunset Boulevard. None of the Columbia Square Complex buildings generate substantial glare given their stucco finishes and narrow windows.

d. Shade and Shadow

Given the number of mid- to high-rise buildings throughout the urban project area, shading is a common and expected phenomenon. Sensitive uses relative to shading impacts potentially generated by the project include the residential uses to the immediate east of the site across Gower Street. The project site is currently developed with one- to five-story buildings, which generate minimal shadows on off-site uses, particularly since the northern part of the project site is occupied by a surface parking lot. Additionally, none of the surrounding off-site buildings are sufficiently tall to cast shadows on the project site.

2. Air Quality

The project site is within the South Coast Air Basin (the Basin), an approximately 6,745-square-mile area bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. Its terrain, consisting of connecting broad valleys and low hills, and geographical location determine its distinctive climate.

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. Santa Ana winds are dry, warm (often hot), blustery winds

that blow from the desert into the Basin and towards the sea. The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Basin, making it an area of high pollution potential.

The greatest air pollution impacts throughout the Basin occur from June through September. This is generally attributed to emissions of large amounts of pollutants combined with reduced pollutant dispersion due to light winds and shallow vertical atmospheric mixing. Pollutant concentrations in the Basin vary with location, season, and time of day. Ozone concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in Southern California. However, with regard to ambient air quality standards, the Basin remains in non-attainment status for ozone, PM_{10} and $PM_{2.5}$.

3. Historic Resources

In 1899, the project site was occupied by the Cahuenga House, or Blondeau Tavern. The tavern property included a general store, a restaurant and feed store. In 1911, the Nestor Film Company created the first studio in Hollywood in the Blondeau Tavern, remodeling it for motion picture production. The Nestor Film Company produced the first film made entirely in Hollywood, "Law of the Range," that same year. A year after its inception, the Nestor Film Company studio complex burned, destroying most of the original tavern building. A new wooden structure was built on the site and a new sign was erected which read "Christie Film Company, Manufacturers of Nestor Comedies for Universal Films." Between 1912 and 1915, several Universal productions were filmed in buildings around Sunset and Gower. In 1915, Carl Laemmle moved Universal Films to a location in the San Fernando Valley, which became known as Universal City.

After Laemmle moved his primary operations to Universal City, film producer Al Christie expanded the Gower and Sunset lot. From 1918 to 1920, he built more buildings for new production departments. In 1924, Christie completely remodeled the old wooden studio at Gower and Sunset and created a Spanish/Mediterranean-style building. Two years later, the Christie Studio was a Hollywood landmark with billboards on the sides of the studio announcing Christie's feature comedy releases. In 1932, the Christie Studio was renamed Amalgamated Motion Picture Studios and used as a rental facility.

In 1936, the Christie Studio was demolished. William Paley of CBS planned to build the KNX/CBS studios (Columbia Square) at the site and in 1937 groundbreaking for

William Paley's facility took place. Paley had hired renowned architect William Lescaze to design the Columbia Square Complex. Lescaze, working with associate Earl T. Heitschmidt, designed three International Style buildings for the site: the Radio Building, Studio A, and a third commercial wing that housed the Radio Center Restaurant and a bank (later referred to as the Television Building). The complex was well publicized at the time of its construction, featured in many architectural publications including Architectural Forum in May 1937, the July 1938 edition of Architectural Record and in California Arts and Architecture in July 1938. The latter article noted that the complex is "magnificent concrete evidence of radio's independence in the amusement field." The interiors were designed to accommodate the latest technologies and broadcast innovations, and the complex was described as "an inspiring monument to radio, and the cornerstone in the Pacific Coast's destiny as the nucleus of American broadcasting."[2] It was also the first building to integrate broadcasting's technological needs with the ability to include live audiences.

In 1939, Paley hired the Los Angeles firm Parkinson & Parkinson to design another studio building to complement the original Lescaze buildings. Studio B/C housed two large studios equipped for radio production and live audiences of up to 400 people. The Lescaze- and Parkinson-designed components were integrated on both the interior and exterior to create a unified structure around a central courtyard on Sunset Boulevard. Parkinson & Parkinson's subtle design approach and the lack of visibility of Studio B/C from Sunset were specific design decisions to increase the functionality of the complex without competing with the existing architecture. There is a clear hierarchy of the components with the Lescaze-designed elements comprising the public face of the building with the most overt International Style elements. Studio B/C was a secondary, utilitarian space with a different provenance than the original buildings.

There were two additional periods that led to substantial changes to the original design of the complex. In 1961, the Los Angeles firm of Allison and Rible was hired to create additional studio space on the east end of Studio B/C; changes to the entrance canopy facing the courtyard, and alterations to the interior studio spaces were also made at this time. In 1968, William Pereira was commissioned to do some minor alterations to the complex which resulted in significant changes to appearance of the International Style elements of the façades. The canopy connecting Studio A with Studio B/C was framed in and clad in stucco, as were the first floor glass facades of the Radio and Commercial/Television Buildings that framed the courtyard. The current condition of the complex still reflects these changes.

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[2] *"The New Home of the Columbia Broadcasting System," California Arts and Architecture V. 54 (July 1938): 28-29.*

Upon its completion in 1937, the Columbia Square Complex remained the nucleus of West Coast production for decades with many of the CBS' main national programs originating from the site. The complex continued to function throughout the 20th century as a local radio and television facility. The growing popularity of television prompted CBS to build "Television City" in the Beverly-Fairfax District, which opened for production in 1952, followed by the purchase of the CBS Studio Center in Studio City in 1967. These new facilities contributed to the decline of Columbia Square as a major broadcast center. Some of the Columbia Square Complex's radio studios were converted to recording studios for Columbia Records. The local affiliate KCBS-TV continued operations at the site. In 2005, KNX News Radio relocated to new studios in Wilshire Boulevard's Miracle Mile area, ending its 85-year history in Hollywood. In 2005, television programming was also relocated from the Columbia Square Complex site. Both KCBS-TV Channel 2 and KCAL-TV Channel 9 moved to new headquarters in Studio City in that year, ending over eight decades of entertainment production on the site. The Columbia Square Complex was sold a year later and no longer retains its CBS affiliation.

4. Hazards and Hazardous Materials

The project site is currently developed with several buildings, which are currently utilized as entertainment-related, production, and post-production offices and studios (6121 Sunset Boulevard). A planted courtyard (Sunset Courtyard) is located on the southern portion of the project site, immediately north of Sunset Boulevard between the Radio Building and Television Building.

Various hazardous materials are located on the project site. In particular, small quantities of hazardous substances are currently used on the portion of the project site occupied by television and radio station operations, including common cleaning and maintenance supplies, paints, pesticides, motor oil, hydraulic oil, coolant, refrigerant, and lacquer thinner. Because these supplies are used in small quantities on the project site, they do not pose an environmental concern. Fluorescent light ballasts are located within the buildings occupied by television and radio station operations. Fluorescent light ballasts manufactured prior to 1979 may contain small quantities of poly-chlorinated biphenyls (PCBs). Since these buildings were constructed prior to 1979, it is possible that the fluorescent light ballasts contain PCBs.

Two 50-gallon aboveground storage tanks (ASTs), one 100-gallon AST, and one 6,000-gallon underground storage tank (UST) containing diesel fuel for emergency generators are located on the portion of the project site currently occupied by television and radio station operations. The three ASTs are located in a generator building located near the southwest corner of the project site, while the UST is located immediately north of the generator building. The UST has a leak within its secondary containment; however, no

evidence of a fuel release is evident to date. In addition, a 6,000-gallon UST was abandoned in 1995 on the portion of the project site currently occupied by television and radio station operations. Soil samples were collected during the removal of the former UST and analyzed for total petroleum hydrocarbons as diesel (TPH-D); benzene, toluene, ethylbenzene, and xylene (BTEX); and lead. The soil samples were non-detect for TPH-D and BTEX and below current action levels for lead. The Los Angeles Fire Department (LAFD) issued a no further action letter with regard to the former UST in September 1999. Therefore, the former UST does not present an environmental concern to the project site.

Because all of the existing buildings located on the project site were constructed prior to 1980, it is likely that asbestos is present in some of the building materials (i.e., floor tiles and mastic, ceiling tiles, and piping insulation wrap). Furthermore, signs stating the presence of asbestos were observed in the buildings occupied by television and radio station operations. Due to the time frame in which the buildings located on the project site were constructed, it is also possible that lead-based paint is present. However, no lead-based paint sampling has been conducted. The project site is not located within a City-designated methane zone or methane buffer zone. Furthermore, according to Division of Oil, Gas, and Geothermal Resources (DOGGR) records, no oil wells are located directly on the project site.

The television and radio station operations located at 6121 Sunset Boulevard are listed on the Hazardous Waste Information System (HAZNET), Emissions Inventory Data (EMI), Underground Storage Tank (UST), California Facilities Inventory Database (CA FID UST), Statewide Environmental Evaluation and Planning System (SWEEPS), and Historical UST databases. The majority of the listings pertain to the former UST and existing UST located at the project site. The EMI listing pertains to emissions associated with the diesel emergency generators located at the project site. Additionally, 6122 Selma Avenue (previously, Criterion Music Publishing) is listed on the EDR Historical Auto Stations (EDR HAS) database. The EDR HAS listing pertains to the former auto repair facility located on the project site.

5. Hydrology and Water Quality

The project site lies within the Ballona Creek Watershed. Within this watershed, stormwater that does not percolate into the ground is directed into storm drains that eventually discharge into Ballona Creek, which in turn discharges to the Pacific Ocean.

The project site is currently developed with close to 100 percent of impervious surfaces, including several buildings. The drainage area for the project site is generally divided into nine drainage subareas (i.e., A1 through A9). The Stormwater Group of the City's Bureau of Engineering has stated that the existing storm drain system serving the

project site has no existing problems. The existing stormwater runoff rate at the project site is approximately 11.86 cubic feet per second (cfs) during a 10-year storm event and 18.85 cfs during a 50-year storm event.

With regard to water quality, existing stormwater runoff from the project site has the potential to contribute oil and grease, suspended solids, gasoline, pesticides, and pathogens to the stormwater conveyance system. Stormwater from the project site is currently not treated prior to entering the storm drain system.

6. Land Use

The project site is located within the Hollywood Community of the City of Los Angeles, approximately six miles northwest of downtown Los Angeles and 13 miles northeast of the Pacific Ocean. The project site consists of approximately 4.68 acres comprising the city block bound by Selma Avenue to the north, Gower Street to the east, Sunset Boulevard to the south, and El Centro Avenue to the west.

The project site is located within the Hollywood Community Plan Area, the Hollywood Redevelopment Project Area of the Community Redevelopment Agency (CRA), the Hollywood Signage Supplemental Use District (HSSUD), the City's Adaptive Reuse Incentive Area, a City of Los Angeles State Enterprise Zone (EZ), and the Central City Revitalization Zone. The project site is designated for "Commercial Manufacturing" Industrial land uses pursuant to the City's General Plan Framework and the Hollywood Community Plan. In addition, the project site is zoned as [Q]C4-1VL-SN. The "[Q]" portion of this designation indicates that a Permanent Qualified Classification condition (referred to as a Qualifying or [Q] condition) applicable to the project site is in place. Per Ordinance No. 165,662, the [Q] condition specifically prohibits "residential uses…, except as otherwise permitted in the industrial zones." "Qualifying Conditions" apply to the project site. The "C4" portion of the zoning designation indicates that the project site is zoned for Commercial uses, while the "1VL" portion of the designation indicates that the site is within a Very Limited Height District No.1, which restricts building heights to a maximum of 45 feet and three stories. The "SN" portion of the zoning designation indicates that the project site is within the Hollywood Signage Supplemental Use District (HSSUD).

The project site encompasses the existing Columbia Square Complex, which includes several buildings containing television studio and related office uses. The Columbia Square Complex structures are located in the southern portion of the project site, either fronting Sunset Boulevard and/or situated around an outdoor courtyard along Sunset Boulevard. Specifically, the Columbia Square Complex includes four concrete buildings ranging in height from one to five stories. Though the Columbia Broadcasting System (CBS) operations officially relocated to Studio City in 2005, the buildings on-site are

currently utilized as entertainment-related, production and post-production offices and studios. Together, the existing buildings on-site represent approximately 136,233 square feet of floor area.

The remainder of the project site is developed with surface parking, which is accessed from El Centro Avenue, with limited landscaping along the site perimeter in the form of ornamental, non-native/non-protected trees. The project site is generally flat, with a topography that gently slopes down from the north to the south. Given its location within a highly urbanized area, the project site is well served by a network of major roadways, freeways, and public transit providers.

The project vicinity is located in a portion of the City that is undergoing a significant transition. High-density mixed-use development is occurring throughout the area, as the City continues to "[direct] growth to transit-rich and job-rich centers and [support] the growth with smart, sustainable infill development and infrastructure investments.[3] Faced with a growing population, the City has identified various properties throughout the Hollywood area, including the project site, as containing additional residential capacity under current zoning.[4] In addition, the site is located in close proximity to local and regional employment and public transportation opportunities.

7. Noise

The predominant noise source within the project vicinity is roadway noise from local thoroughfares such as Sunset and Hollywood Boulevards, and surrounding streets including Gower Street, El Centro Avenue and Selma Avenue. Other community noise sources include incidental noise from existing commercial, light industrial, residential, and school uses, ambulance sirens, distant aircraft over-flights, and landscaping maintenance activities at nearby residential and commercial uses.

Some land uses, including residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks, are generally more sensitive to noise than commercial and industrial land uses due to the amount of noise exposure and the types of activities typically involved at the receptor location. Noise sensitive land uses in the immediate project vicinity include residential uses east of the project site along Selma Avenue and Harold Way, approximately 75 feet from the project boundary; residential uses northeast of the project site along Carlton Way, east of Gower Street;

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[3] *City of Los Angeles General Plan, Housing Element 2006-2014, Executive Summary, page 1, August 13, 2008.*

[4] *City of Los Angeles General Plan, Housing Element 2006-2014, Appendix H, August 13, 2008.*

residential uses to the south of the project site along El Centro Avenue, just south of Leland Way, approximately 400 feet from the project site; and residential uses located at the northwest quadrant of Sunset Boulevard and Vine Street, approximately 900 feet from the project site. In addition, a proposed mixed-use development, the Hollywood Palladium project, is located across the project site along El Centro Avenue, approximately 70 feet west of the project site.

8. Public Services

(a) Fire Protection

In the City of Los Angeles, fire prevention and suppression services are provided by the Los Angeles Fire Department (LAFD). The LAFD is a full-spectrum life safety agency serving a population of approximately four million throughout the City of Los Angeles and its environs. The LAFD has approximately 3,594 uniformed personnel providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, and public education and community services. There are 106 neighborhood fire stations covering 471 square miles within the LAFD's jurisdiction. At any given time, a total of 1,101 firefighters, including 226 paramedics, are on 24-hour duty. In addition, the LAFD is supported by 346 technical and administrative personnel. During 2007, the LAFD had 757,203 responses.

There are three LAFD fire stations located near the project site. Fire Station No. 27 is located at 1327 N. Cole Avenue, approximately 0.55 miles southwest of the project site. Fire Station No. 82 is located at 1800 N. Bronson Avenue, approximately 0.5 miles northeast of the project site, and Fire Station No. 41 is located at 1439 N. Gardner Street, approximately 1.75 miles west of the project site. The project site is located within the neighborhood boundaries of Fire Station No. 27, which is designated as the "first-in" station in the event of emergencies.

(b) Police Protection

The Los Angeles Police Department (LAPD) currently comprises 19 community police areas operated by four geographically located bureaus: the Central, South, West, and Valley Bureaus. The project site is located in the West Bureau's Hollywood Area, which covers 17.51 square miles, and is served by the Hollywood Community Police Station located at 1358 Wilcox Avenue (approximately 0.64 miles northeast of the project site). The service boundaries of the Hollywood Community Police Station include Mulholland Drive and the Los Angeles City boundary to the north; Normandie Avenue, Ferndell Drive, and Griffith Park to the east; the Los Angeles City boundary and Beverly

Boulevard to the south; and the Los Angeles City boundary to the west. The Hollywood Community Police Station provides police protection service to a residential population of approximately 230,383 people within its service area. In the event additional staffing is required, additional officers can be called in from other LAPD areas.

The Hollywood Area is further divided into several reporting districts. The project site is located within Reporting District (RD) 647, which extends to Hollywood Boulevard to the north, the Hollywood Freeway (US-101 Freeway) to the east, Sunset Boulevard to the south, and Vine Avenue to the west. The Hollywood Area/Hollywood Community Police Station has 330 sworn officers and 24 civilian support staff.

(c) Schools

The Los Angeles Unified School District (LAUSD) is the largest (in terms of number of students) public school system in California and the second-largest in the United States. LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles and all or portions of 32 other cities. During the 2007-2008 school year, LAUSD provided kindergarten through high school (K–12) education to a total of approximately 694,288 students enrolled throughout 1,190 schools and centers, including 436 elementary schools, 75 middle schools, 64 senior high schools, 194 early education centers and occupational centers, and 118 charter schools and centers.

The project is located in Local District 4. The schools that would serve the project site include Grant Elementary School, Le Conte Middle School, and Hollywood Senior High School. All three schools are currently operating on a multi-track year-round calendar.

(d) Parks and Recreation

The City of Los Angeles Department of Recreation and Parks (DRP) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the project vicinity. Currently, the DRP maintains and operates more than 390 sites for recreational use, including 180 recreation centers, 59 swimming pools, 13 municipal golf courses, nine lakes, seven camps both in and out of City limits, more than a dozen museums and historic sites, and hundreds of programs for youth, senior, physically disabled, and volunteers. The DRP also administers more than 15,600 acres of parkland, including 4,217 acres in Griffith Park, one of the largest municipal parks within the boundaries of an American city.

(e) Libraries

The Los Angeles Public Library (LAPL) system provides library services to the City of Los Angeles. LAPL consists of the Central Library and 71 branch libraries, with a multimedia inventory of over 6.3 million items and 2,200 computer workstations with access to the internet and electronic databases.

Three libraries are located in the vicinity of the project site, the Frances Howard Goldwyn Hollywood Regional Branch Library, the Will and Ariel Durant Branch Library, and the John C. Fremont Branch Library. The Frances Howard Goldwyn Hollywood Regional Branch Library at 1623 N. Ivar Avenue, located approximately 0.5 miles east of the project site. This 19,000 square-foot regional branch serves a current population of 83,173 people. The library has 20 staff positions and 193,000 volumes. The Will and Ariel Durant Branch Library may also serve the project site. This 12,500 square foot branch was constructed in 2003-2004 and serves a current population of 33,048 people. The library has nine staff positions and contains 57,311 volumes. The John C. Fremont Branch Library serves a population of approximately 25,100 people. This library has seven staff positions and 37,000 volumes.

9. Transportation and Circulation

Local access to the project site is provided by Sunset Boulevard, El Centro Avenue, Selma Avenue, and Gower Street, which bound the project site to the south, west, north, and east, respectively. Primary regional access to the project site is provided by Vine Street, Hollywood Boulevard, and the US-101 (or the Hollywood Freeway). Regional access is also provided by Cahuenga Boulevard, which runs in a north-south direction west of the project site; Vine Street, which runs in a north-south direction east of the project site; Sunset Boulevard, which runs in an east-west direction on the southern edge of the project site; and Hollywood Boulevard, which runs in an east-west direction north of the project site.

The Los Angeles County Metropolitan Transportation Authority (Metro) and City of Los Angeles Department of Transportation (LADOT) Downtown Area Shuttle (DASH) system provide public transit service in the vicinity of the project site.

10. Utilities and Service Systems

(a) Water Supply

The Los Angeles Department of Water and Power (LADWP) is responsible for providing water within City limits and for ensuring that water quality meets applicable

California health standards for drinking water. Water is supplied to the City from local groundwater, the Los Angeles Aqueducts (LAA), and the Metropolitan Water District of Southern California (MWD).

As estimated by the LADWP, the project site has an existing water use demand of approximately 29,181 gallons per day (gpd) or 33 acre-feet (AF) per year. The water infrastructure serving the project site consists of domestic water mains located in the City streets surrounding the project site. This includes a 10-inch water main in Sunset Boulevard, and 8-inch water mains located in Gower Avenue, Selma Avenue, and El Centro Avenue.

(b) Wastewater

All wastewater generated within the City of Los Angeles is conveyed to and treated at the Hyperion Treatment Plant (HTP) in Playa del Rey. The HTP serves a total area of 600 square miles and is the City of Los Angeles' oldest and largest wastewater treatment facility. The majority of effluent from the HTP is discharged into Santa Monica Bay while the remaining effluent is conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. Effluent discharged into Santa Monica Bay from the HTP has historically had effects on water quality. However, since the HTP's full secondary effluent discharge began in 1999, water quality has improved with an increase in the number of species and the biodiversity in Santa Monica Bay.

The project site's existing office buildings/studios and parking lot are estimated to generate, on average, approximately 23,330 gpd of wastewater with a peak flow of 39,661 gpd. Several sewer mains are located in the vicinity of the project site, including a 6-inch and 8-inch sewer main along Selma Avenue, an 8-inch and 10-inch sewer main along Gower Street, an 8-inch and 21-inch sewer main along Sunset Boulevard, and an 8-inch and 10-inch sewer main along El Centro Avenue. LADPW does not allow the flow within its sewer mains to exceed 50 percent capacity as any sewer mains exceeding this limit are considered deficient. Except for the 10-inch main in El Centro Avenue and the 21-inch main in Sunset Boulevard, actual current flow levels are not known for the sewer mains listed above.

(c) Solid Waste

Solid waste in Los Angeles County is collected by over 250 private waste haulers and several city governments. Solid waste that is not recycled, reused, or transformed at a waste-to-energy facility is disposed of at a landfill. Landfills within Los Angeles County are generally classified as either Class III landfills, which accept non-hazardous solid waste, or unclassified (inert) landfills, which accept construction waste, yard trimmings, and earth-like waste. The

County has eleven Class III landfills and three unclassified landfills. In 2007, approximately 8.731 million tons of solid waste was disposed of in the County's Class III landfills.

Generally, the Bureau of Sanitation provides waste collection services for single-family and some smaller multi-family developments while private haulers provide waste collection services for most multi-family residential and commercial developments. However, the City does not own or operate any landfill facilities. Thus, all solid waste within the City is disposed of at privately-owned facilities. The 2008 remaining disposal capacity for the County's Class III landfills open to all or portions of the City of Los Angeles is estimated at 145.2 million tons, and the 2008 remaining disposal capacity for the County's unclassified landfills open to the City of Los Angeles is estimated at 46.206 million tons.

11. Population and Housing

The project site is currently developed with four structures of the Columbia Square Complex occupying a total of 136,233 square feet of floor area that front along Sunset Boulevard. These buildings are currently utilized as entertainment-related, production, and post-production offices and studios. While the project site currently generates employees associated with the short-term, entertainment-related, production and post-production office and studio uses, no housing and thus, no residential population exists on the site.

III. Environmental Setting

B. Related Projects

The California Environmental Quality Act (CEQA) requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts."[5] This analysis of cumulative impacts need not be as in-depth as what is performed relative to the project, but instead is to "be guided by the standards of practicality and reasonableness."[6]

According to Section 15130(b)(1) of the CEQA Guidelines, either one of the following elements is necessary to an adequate discussion of significant cumulative impacts:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts; or
- A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area wide conditions.

The project is anticipated to be completed by 2013. Accordingly, the effects of other proposed development projects that may be constructed between 2009 and 2013 are considered as potentially contributing to cumulative impacts. This cumulative analysis has utilized a listing of related projects based on information on file at the City of Los Angeles Department of Planning and LADOT. The study area generally incorporates the area in which the project might substantially affect traffic conditions. The development of 94 related projects is anticipated in the project study area. Table III-1 on page III-16 summarizes the location, land use, and size of each related project. Figure III-1 on page III-21 depicts the location of each related project. The map numbers identified in Table III-1 correspond to the related project numbers identified in Figure III-1. The projected cumulative development is addressed in the analysis of all environmental issues.

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[5] *State CEQA Guidelines, 14 California Code of Regulations, § 15355, et seq.*

[6] *Ibid, § 15355.*

Table III-1
List of Related Projects

Map No. [a]	Location	Land Use	Size [b]
1	1674 Hillhurst Avenue	Mini-mart & liquor store	3,960 sf
2	145 La Brea Avenue	Shopping Center	18,610 sf
3	5777 Hollywood Boulevard	Fast food restaurant w/drive thru Specialty Retail	3,236 sf 5,275 sf
4	6107 Hollywood Boulevard	Hotel Specialty Retail	86 rooms 5,000 sf
5	1934 Cahuenga Boulevard	Gas station w/mini-mart	8 vfp
6	1600 Vine Street	Cocktail lounge	11,884 sf
7	7950 Sunset Boulevard	Sunset Legacy Lofts Retail	183 du 12,891 sf
8	221 Westmoreland Avenue	Private School	480 seats
9	5920 Melrose Avenue	Apartments Retail	54 du 16,000 sf
10	6300 3rd Street	Park La Brea Apartment Addition	300 du
11	5600 Wilshire Boulevard	Apartment Restaurant Retail	288 du 4,000 sf 8,500sf
12	648 Western Avenue	Apartment Retail	240 du 49,900 sf
13	801 Fairfax Avenue	Apartment Retail	93 du 15,862 sf
14	5165 Fountain Avenue	Apartments	110 du
15	922 Western Avenue	Apartments Retail	63 du 13,500 sf
16	6142 Franklin Avenue	Apartments	130 du
17	600 Hobart Boulevard	Condominiums Retail	70 du 8,558 sf
18	3800 Wilshire Boulevard	Apartments	91 du
19	6735 Yucca Street	Condominiums	54 du
20	6298 3rd Street	Apartments	300 du
21	1714 McCadden Place	Condominiums	218 du
22	238 Manhattan Place	(Private Elementary School Expansion) Classroom Building Gymnasium Parking	100 students 11,260 sf 11,350 sf 192 spaces
23	936 Crenshaw Boulevard	Office	17,670 sf
24	1611 La Brea Avenue	Condominiums Retail	180 du 13,700 sf
25	6531 Hollywood Boulevard	Quality Restaurant Jazz Club	931 sf (74-seat) 5,390 sf (159-seat)
26	5555 Hollywood Boulevard	(Hollywood/Garfield Mixed Use) Condominium Retail	 108 du 9,937 sf
27	1736 Mc Cadden Place	Condominiums	218 du

Table III-1 (Continued)
List of Related Projects

Map No. [a]	Location	Land Use	Size [b]
28	5400 Hollywood Boulevard	Apartments Retail	42 du 6,778 sf
29	6726 Sunset Boulevard	Retail (Drugstore)	16,000 sf
30	Fountain Avenue	LAUSD - Central Region Middle School #5	891 students
31	1717 Vine Street	Condominiums Restaurant	57 du 5,489 sf
32	3670 Wilshire Boulevard	Condominium Other	378 du 8,000
33	5500 Wilshire Boulevard	(Desmond's Tower Residential Development) Apartments	 175 du
34	4500 Los Feliz Boulevard	Condominiums Supermarket Retail	80 du 40,000 sf 7,441 sf
35	450 Western Avenue	Mixed-Use	- [c]
36	6250 Hollywood Boulevard	(Hollywood & Vine Mixed-Use) Apartments Condominiums Hotel Restaurant Retail	 375 du 150 du 300 rooms 49,500 sf 12,000 sf
37	5651 Santa Monica Boulevard	Apartments Retail	437 du 377,900 sf
38	5420 Sunset Boulevard	Gas station	10 vfp
39	2000 Fuller Avenue	Runyon Canyon Park-Parking Lot	80 spaces
40	6040 Sunset Boulevard	Office Building	120,000 sf
41	6200 Hollywood Boulevard	Apartments Retail	952 du 190,777 sf
42	694 Hobart Boulevard	Condominiums Health Club Restaurant Hi-Turnover Restaurant Night Club Office Retail	242 du 25,700 sf 26,600 sf 4,200 sf 9,700 sf 13,600 sf 4,400 sf
43	6915 Melrose Avenue	Condominiums Retail	13 du 7,500 sf
44	5863 3rd Street	(Third Street Mixed-Use Project) Apartments Retail	 60 du 5,350 sf
45	5800 Sunset Boulevard	(KTLA office/studio expansion) Office Soundstage	 740,987sf 82,500 sf
46	5935 Sunset Boulevard	(Sunset & Gordon Mixed-Use) Condominiums Office Retail/Restaurant Space	 144 du 10,455 sf 10,455 sf

Table III-1 (Continued)
List of Related Projects

Map No. [a]	Location	Land Use	Size [b]
47	1538 Vine Street	(Sunset & Vine Mixed-Use) Apartments Retail	 306 du 68,000 sf
48	7600 Beverly Boulevard	LA Holocaust Museum	8,400sf
49	1800 Argyle Avenue	(Argyle Lofts) Apartments Office	 73 du 23,000 sf
50	6757 Hollywood Boulevard	Restaurant	13,132 sf
51	6758 Yucca Street	Apartments Retail	270 du 8,500 sf
52	101 La Brea Avenue	(La Brea Urban Lofts) Condominiums Retail Restaurant	 118 du 26,4000 sf 3,000 sf
53	725 Curson Avenue	Restaurant Office	800 sf 28,800 sf
54	6523 Hollywood Boulevard	Restaurant (w/ gourmet shop)	15,161 sf
55	6506 Hollywood Boulevard	Restaurant Multi-Purpose Entertainment Venue	745 sf 12,255 sf
56	5663 Melrose Avenue	Condominiums Retail	96 du 3,350 sf
57	100 Western Avenue	(HK Town Project Mixed-Use) Shopping Center Supermarket Apartments	 40,800 sf 48,000 sf 187 du
58	6904 Hollywood Boulevard	Retail Office	29,900 sf 16,700 sf
59	3324 Wilshire Boulevard	Condominiums Retail	108 du 3,450 sf
60	6001 Carlton Way	Condominiums	42 du
61	7300 Hollywood Boulevard	Temple Israel of Hollywood Expansion School Chapel	 75 students 3,000 sf
62	6677 Santa Monica Boulevard	Apartments Retail Restaurant	787 du 12,700 sf 9,500 sf
63	6100 Hollywood Boulevard	Apartments Retail	151 du 6,200 sf
64	6230 Yucca Street	Office Live/Work Units Condominiums	13,790 sf 10 du 85 du
65	5245 Santa Monica Boulevard	Assisted-Living Apartments Retail	68du 51,674 sf
66	6600 Sunset Boulevard	Hotel	50 room
67	959 Seward Street	Office	240,000 sf
68	6911 Santa Monica Boulevard	Condominiums Retail	374 du 15,000 sf

Table III-1 (Continued)
List of Related Projects

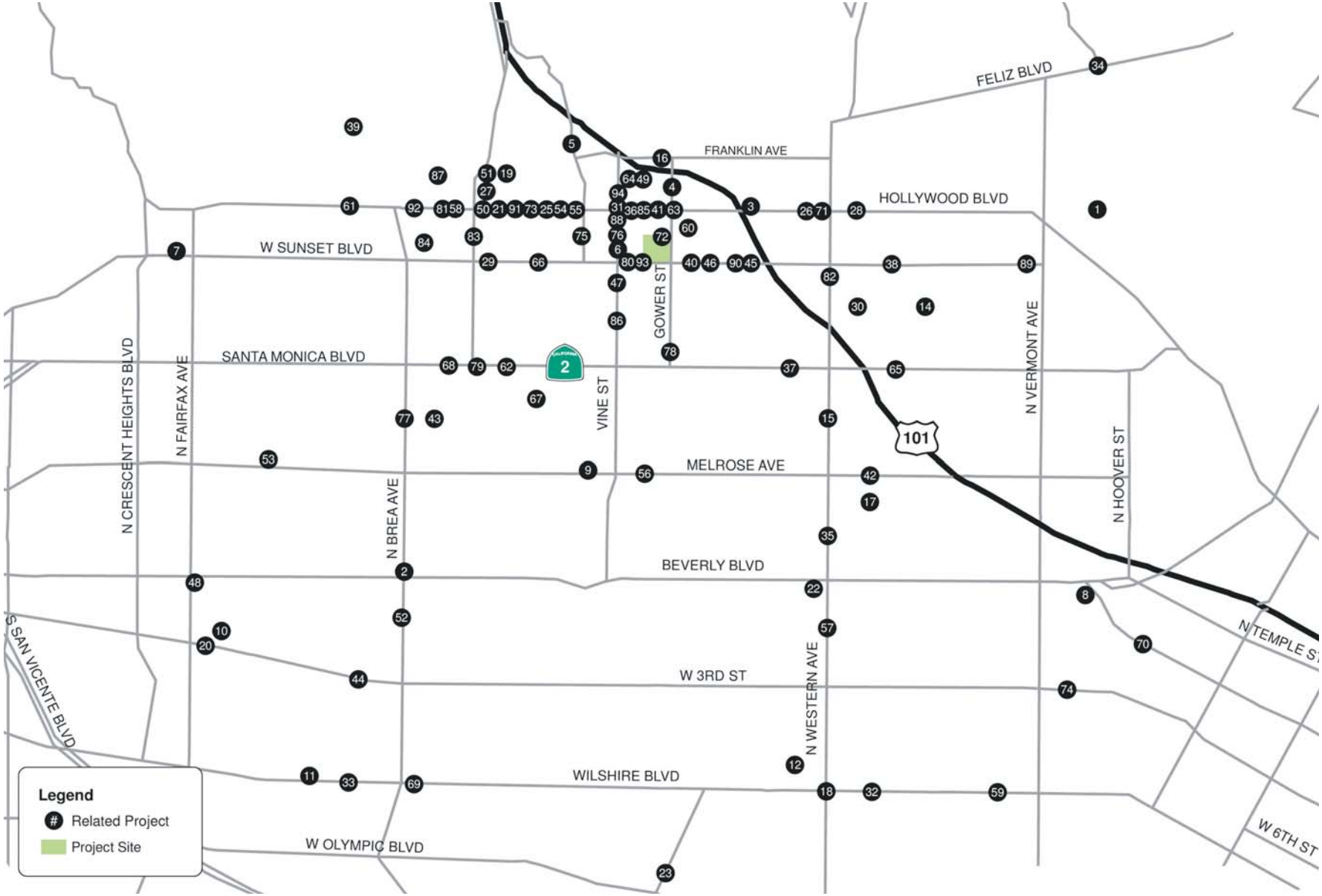
Map No. [a]	Location	Land Use	Size [b]
69	5200 Wilshire Boulevard	Wilshire La Brea High Rise	
		Condominiums	332 du
		Retail	34,000
70	3200 Beverly Boulevard	Apartments	32 du
		Retail	5,870 sf
71	5550 Hollywood Boulevard	Hollywood Passage (Mixed-use)	
		Condominiums	216 du
		Retail	18,353 sf
72	6156 Selma Avenue	Wilcox Selma Office Condominiums	85,000 sf
73	6608 Hollywood Boulevard	Quality Restaurant	8,100 sf
74	3400 3rd Street	(Almond Tree Village)	
		Condominiums	147 du
		Senior-Housing Apartments	261 du
		Retail	20,000sf
75	6417 Selma Avenue	Hotel	100 room
		Hotel Reception Area	1,300 sf
		Restaurant/Club	6,246 sf
		Ballroom	4,000 sf
		Rooftop Pool Bar/Lounge	6,767 sf
76	1601 Vine Street	(Selma & Vine Office Building)	
		Office	102,311 sf
		Restaurant	3,841 sf
		Deli	2,030 sf
77	915 La Brea Avenue	Apartments	219 du
		Market	35,000 sf
		Office	14,530 sf
		Studio	41,136 sf
78	1149 Gower Street	(Hollywood Production Center)	
		Apartments	21 du
		Condominiums	36 du
79	6766 Santa Monica Boulevard	Pharmacy/Drug Store	13,387 sf
80	6215 Sunset Boulevard	(Palladium Renovation)	
		Specialty Retail	10,000 sf
81	6931 Hollywood Boulevard	(Madame Tussauds Wax Museum)	
		Tourist Attraction	42,689 sf
		Retail	1405 sf
82	1417 N Western Avenue	(Target - Sunset Shopping Center)	
		Retail	194,935 sf
		Shopping Center	27,655 sf
83	1600 N Highland Avenue	(Highland Center Mixed-Use Project)	
		Condominiums	496 du
		Hotel	300 room
		Office	186,200 sf
		Retail	45,400 sf
84	7045 W Lanewood Avenue	Lanewood Condos	43 du
85	6225 Hollywood Boulevard	Pantages Theatre Office	214,000 sf
86	1313 Vine Street	Academy Museum of Motion Pictures	- [c]

Table III-1 (Continued)
List of Related Projects

Map No. [a]	Location	Land Use	Size [b]
87	1782 N. Orange Drive	ASC Screening Room Facility Screening & Dining Room Parking	25,573 sf 270 seat 48 spaces
88	1645 Vine Street	Condominiums	96 du
89	4747 Sunset Boulevard	Hospital Expansion	460 beds
90	5825 Sunset Boulevard	(Metropolitan Hotel Site) Office	 40,000 sf
91	6611 Hollywood Boulevard	(CIM/EISEN project) Retail	 60,200 sf
92	7060 Hollywood Boulevard	(Broadstone Hollywood) Condominiums Theatre	 130 du 99 seats
93	6215 Sunset Boulevard	(Palladium) Office Restaurant Condominiums Hotel	 237,000 sf 12,700 sf 170 du 251room
94	1750 Vine Street	(Capital Records Tower) Condominiums Hotel Office Retail/Restaurant/Fitness	 450 du 200 rooms 00,000 sf 00,000 sf

[a] *Corresponds with Map Nos. on Figure III-1, below.*
[b] *du = dwelling units; sf = square feet, vfp = vehicle fuel pump*
[c] *Size of the project was not provided.*

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, 2009.



Columbia Square

Figure III-1
Location of Related Projects

Source: Fehr & Peers/Kaku Associates, 2008

IV. Environmental Impact Analysis

IV. Environmental Impact Analysis

A. Aesthetics, Views, Light/Glare, and Shading

1. Introduction

This section addresses the potential impacts that could result from the project with regard to aesthetics, views, light/glare, and shading. Aesthetics refers to the overall visual quality of an area or a field of view. Aesthetics or visual quality encompasses development aspects such as size, shape, color, texture, and general composition, as well as the relationships between these elements. Aesthetic features often consist of unique or prominent natural or man-made attributes that are visually interesting or appealing. Adverse visual quality effects can include the loss of existing valued aesthetic features or the introduction of contrasting features that contribute to a decline in overall visual character. For instance, the introduction of contrasting features can overpower familiar features, eliminate context or associations with history, or create visual discordance where there may have been apparent efforts to maintain or promote a thematic or consistent character. The aesthetics analysis presented below addresses the project's visual relationship with existing and known future land uses in the surrounding area, as well as the consistency of the project with the regulatory environment (e.g., applicable plans and ordinances that address visual quality).

The degree of visual access to an aesthetic resource contributes to the value of aesthetic features. In this regard, the analysis of view obstruction focuses on the extent to which a project may interfere with visual access to aesthetic features from a vantage point or corridor. "Focal views" consist of views of a particular object, scene, setting, or feature of visual interest. "Panoramic views" or vistas consist of views of a large geographic area for which the view may be wide and extend into the distance. Structures and other elements constructed or developed as part of a project may obstruct focal or panoramic views. The State of California and the City of Los Angeles have recognized the value of public access to visual resources through planning and zoning regulations that designate, preserve, and enhance public views. Through the designation of scenic resources and various land use plans, the City specifies development standards that help prevent the obstruction of publicly valued views. These standards include the regulation of building height, mass, and floor area ratio (FAR), which are principal issues in view obstruction.

With regard to light and glare, artificial light impacts are typically associated with light that occurs during the evening and nighttime hours and may include streetlights, illuminated signage, vehicle headlights, and other point sources. Uses such as residences and hotels are considered light sensitive since they are typically occupied by persons who have expectations for privacy during evening hours and who are subject to disturbance by bright light sources. Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light sensitive land use.

Shading from buildings and structures has the potential to block sunlight. Although shading is a common and expected quality in urban areas and considered a beneficial feature of the environment when it provides cover from excess sunlight and heat, it can have an adverse impact if the blockage interferes with sun-related activities and desired sunlight at shade-sensitive uses.

2. Environmental Setting

a. Existing Visual Environment

(1) Aesthetics/Visual Quality

(a) Project Site

Located within Hollywood, the historic center of the entertainment industry, the project site is situated in a highly urbanized area that includes a mix of commercial, entertainment, office, and residential uses. The project site consists of approximately 4.68 acres comprising the block bound by Selma Avenue to the north, Gower Street to the east, Sunset Boulevard to the south, and El Centro Avenue to the west. Encompassing the existing CBS Columbia Square Complex (Columbia Square Complex), the project site is currently developed with several buildings containing television studio and related office uses, all of which are located in the southern portion of the project site, either fronting Sunset Boulevard and/or situated around an outdoor courtyard along Sunset Boulevard. As shown in the photo provided in Figure IV.A-1 on page IV.A-3, the Columbia Square

Columbia Square

Figure IV.A-1
Existing Site Development

matrix environmental

Source: LJG Partners, 2007.

Complex was designed in an International architectural style and includes four concrete buildings ranging in height from one to five stories, with some of the existing buildings dating back to 1937 and 1938 (additional photos of the site are provided in the discussion of views, below). More specifically, three of the buildings or wings that the complex houses, the Radio Building, Studio A, the Television Building, were designed by William Lescaze and completed in 1937. The Radio Building (1st Wing) is five stories with a basement level, a mezzanine level, and a roof-top penthouse; Studio A (2nd Wing) is a two-story structure with a basement; and the Television Building (3rd Wing) is a one-story structure with a mezzanine and a basement. A fourth building or wing, a two-story addition known as Studio B/C, was built directly to the northeast of the existing buildings in 1938. Studio B/C was designed by Parkinson and Parkinson in the same International style. The International style, which emanated from Western Europe and became popular in the United States in the 1930s, embraced an industrial, machine aesthetic characterized by clean lines, pure geometric forms and materials such as metal, glass, and concrete. Though former CBS operations officially relocated from the Columbia Square Complex to Studio City in 2005, the existing buildings on-site are currently utilized as offices and studios. Currently, all of the Columbia Square Complex buildings have a stucco finish painted a dusty rose color, and several wall signs are located along the unarticulated building façades at the intersections of Sunset Boulevard/El Centro Avenue and Sunset Boulevard/Gower Street.

As discussed in detail in Section IV.C, Cultural Resources, of this Draft EIR, the existing Columbia Square Complex buildings are considered historic resources under CEQA. The buildings appear eligible for listing on the National Register of Historic Places (National Register) and the California Register (California Register) of Historical Resources due to their association with the development of radio and television in the United States and their importance as major components of the entertainment industry in Hollywood. Specifically, the buildings are important as an intact group of resources that were instrumental in the development of Hollywood as a national center of radio and television production. Additionally, the buildings serve as an excellent example of International Style architecture in Los Angeles and a representative work of master architect William Lescaze and the architectural firm of Parkinson & Parkinson. The Los Angeles City Council also has designated the Columbia Square Complex a City of Los Angeles Historic-Cultural Monument.

The remainder of the project site is developed with surface parking, which is accessed from El Centro Avenue, with limited landscaping along the site perimeter in the form of ornamental, non-native/non-protected trees and hedges. Together, the existing on-site buildings represent approximately 136,233 square feet of building area.

(i) Surrounding Area

The project vicinity is highly urbanized and built out with predominantly low- to mid-rise buildings. The area includes a mix of office, commercial and entertainment uses, including motion picture and television studio/production uses, as well as residential uses. While the area contains a number of historic resources (described further below), it has been undergoing a substantial transformation in recent years, and new and ongoing development in the vicinity includes dense mixed uses with mid- and high-rise buildings. While the project site and environs are generally flat, with a topography that gently slopes down from north to south, the Hollywood Hills to the north are a distinctive component of the Hollywood urban skyline.

The majority of properties immediately surrounding the project site are designated for commercial use and comprise a variety of uses, including: a four-story parking structure and a two-story office building called the Rich Mar building across Selma Avenue, a car wash, and a Bally's Gym facilities to the north; a two-story apartment building, one- and two-story office structures, and retail and restaurant uses to the east along Gower Street, including Sunset Gower Plaza, with a bakery, restaurant, bar, and offices; Sunset Gower Studios, retail facilities, restaurant/bar uses, and the "Gower Gulch," which includes a mix of restaurant and retail establishments to the immediate south and southeast along Sunset Boulevard; the Hollywood Palladium event venue and 21-story House of Blues high-rise office building (Sunset Media Tower) to the west across El Centro Avenue; as well as Nickelodeon Studio and a car wash to the southwest along Sunset Boulevard. Refer to Figures IV.A-2 and IV.A-3 on pages IV.A-6 and IV.A-7, respectively, for photographs of development immediately surrounding the project site (additional photos of the project area are provided in the discussion of views, below). Most residential uses in the area are generally situated behind the commercial uses fronting major roadways and thus, single- and multi-family residential uses are located further to the east and northeast of the site, and one- and two-story multi-family residential uses are located further south of the uses that front Sunset Boulevard. Other major uses and facilities in the area include offices, a bank, Hollywood Community Hospital, cinemas, a new mixed-use residential/ commercial development, a nightclub, and a number of surface parking lots. The buildings surrounding the project site range roughly from 1 to 21 stories in height and vary in design, function, and aesthetic character.

The residential neighborhood immediately east and northeast of the project, located between Gower and Gordon Streets and Carlton Way and Sunset Boulevard, contains a number of structures that are contributors to a historic district known as the Selma-La Baig Historic District. Consisting primarily of residences on Harold Way, Selma Way, Carlton Way, and La Baig Avenue, the Selma-La Baig Historic District has been determined to be eligible for listing on the National Register, and many of the contributing structures are currently listed on the California Register. Despite substantial loss of its historic fabric due

Photograph 1: Existing develoment along the south side of Sunset Boulevard near Gower Streeet

Photograph 2: Existing develoment along the east side of Gower Street at Sunset Boulevard

matrix environmental

Figure IV.A-2
Existing Development on Adjacent Streets

Source: Matrix Environmental, 2009

Photograph 3: Existing develoment along the west side of El Centro Avenue at Selma Avenue

Columbia Square

Figure IV.A-3
Existing Development on Adjacent Streets

matrix environmental

Source: Matrix Environmental, 2009

to past demolition of former contributors, the Selma-La Baig Historic District remains an intact eligible district with the most prevalent building type being single-story single-family Craftsman bungalows.[1]

In addition to the Selma-La Baig Historic District, the greater project area is known for a number of historic resources, notably the Hollywood Boulevard Commercial and Entertainment Historic District and the Hollywood Walk of Fame. The Hollywood Boulevard Commercial and Entertainment Historic District is listed on the National Register and contains 57 contributing features; the Hollywood Walk of Fame extends along Hollywood Boulevard between La Brea Avenue and Gower Street as well as along Vine Street between Yucca Street and Sunset Boulevard.[2] Such resources add to the general character of the area and contribute to its historical context associated with the entertainment industry in Hollywood.

Given the eclectic nature of the surrounding land uses and their associated variations in architecture, building heights and building materials, a somewhat non-cohesive visual character is evident throughout the area. In addition, with the exception of the Hollywood Walk of Fame, street segments within the Selma-La Baig Historic District and some of the newer mixed use, restaurant, and retail uses nearby, the immediate area does not provide a pedestrian-friendly atmosphere, and current pedestrian activity in the area is fairly limited, particularly along Sunset Boulevard.

(2) Views

Within the project area, Hollywood Boulevard and Sunset Boulevard are designated as Major Scenic Highways in the Hollywood Community Plan.[3] Hollywood Boulevard provides views of the urban streetscape, which includes the historic buildings within the aforementioned Hollywood Boulevard Commercial and Entertainment District. Sunset Boulevard also provides views of an urban streetscape with a number of historic and potentially historic buildings, including the Cinerama Dome, Hollywood Palladium event venue, and the on-site Columbia Square Complex. In addition, the Selma-La Baig Historic District and its contributing structures are considered valued visual resources. Within the project site, the existing Columbia Square Complex is considered to be a visual resource,

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[1] *Community Redevelopment Agency of the City of Los Angeles, Las Hermanas Residential Project Draft EIR, July 2007.*

[2] *Community Redevelopment Agency of the City of Los Angeles, Hollywood Redevelopment Plan Amendment Final EIR, February 2003.*

[3] *Based on the Hollywood Community Plan map dated September 1991.*

particularly from Sunset Boulevard. Visual resources of merit in the greater project area include the Hollywood Sign, a City-designated historic monument, and the Hollywood Hills located to the north, as well as a number of historic buildings. In particular, the Hollywood Sign and surrounding hills provide an important scenic backdrop to large portions of the metropolitan Los Angeles area, inclusive of views of and near the project site.

(a) Views from the Project Site

Due to the project site's flat topography and surrounding intervening development, views from the site are generally short in range and limited to the urban landscape within the immediate vicinity (i.e., buildings, roadways, billboards, and street trees). Figures IV.A-2 and IV.A-3 demonstrate several of the existing views from the project site. As shown, views to the east and west are, for the most part, obstructed or limited to the building facades of the adjacent buildings. Views to the south consist of low-rise commercial structures, located directly across Sunset Boulevard, with a few mid-rise buildings in the background. While northerly views from the ground level of the project site are limited by mature street trees along Selma Avenue as well as the multi-story parking structure immediately north of the site, intermittent views of the scenic Hollywood Hills and the Hollywood Sign in the distance are possible from elevated view points within the site (i.e., from the upper stories of the Radio Building) and adjacent rights-of-way. However, these views of the hills from within the project site are limited.

(b) Views from the Surrounding Project Area

Public views from vantages within the surrounding project area are also somewhat limited due to dense urban development and flat terrain. Surrounding views consist of the urban landscape with a varied composite of low-rise and mid-rise commercial, entertainment, office, and residential buildings. Intermittent, pedestrian-level, long-range views of the Hollywood Hills and/or Hollywood Sign are available from segments of most north-south roadways in the area (e.g., Gower Street, El Centro Avenue, Argyle Avenue, Vine Street) and more limited segments of some east-west roadways (e.g., portions of Selma Avenue and Sunset Boulevard). Although most private views of the Hollywood Sign and the Hollywood Hills from low-rise buildings are obstructed by existing development, private views of these scenic resources may be available from the upper levels of mid and high-rise buildings in the area (e.g., the Sunset Media Tower and the Sunset + Vine mixed-use building). Photographs of existing views of and across the project site from various vantage points throughout the surrounding project area are provided below within the views analysis.

Short-range views of the project site are obstructed from most public vantages and are generally only available to viewers at adjacent locations (i.e., pedestrians and motorists

along Sunset Boulevard and other adjacent streets). Longer-range private views of the project site may be possible from elevated viewpoints such as mid- and high-rise buildings in the Hollywood Business District.

(c) Views from the Hollywood Hills

The Hollywood Hills, located over one mile to the north of the site, rise to an elevation of approximately 1,100 feet from the base of the hills and are developed primarily with single-family residences along winding streets. Due to their elevated locations on the hillside, many of the residences in the Hollywood Hills are afforded long-range private panoramic views across the project area and the entire Los Angeles Basin. These views of the urban landscape cross over the project site and, on a clear day, such views may extend southeast to downtown Los Angeles and southwest to the Pacific Ocean. In general, long-range views from the Hollywood Hills are not sensitive to individual development projects, as such in-fill development is subordinate to broader views of the urban landscape.

(3) Light/Glare

The project site is located within the highly urbanized Hollywood community, one of the region's most popular nightlife destinations. The project vicinity, in particular, is home to numerous nightclubs, theaters, restaurants, and bars. Lighting from these land uses contribute to the high ambient nighttime light levels that characterize the area. Exterior light sources include lighting for signage, architectural highlighting, parking lot visibility, and security purposes, as well as pole-mounted street lights along adjacent streets and light generated by vehicular traffic on local streets, especially Sunset Boulevard. Interior light spill-over from windows of nearby commercial and residential uses also contributes to the ambient nighttime levels. In the immediate vicinity of the project site, land uses sensitive to nighttime light include the existing residences located to the east across Gower Street.

Light levels generated within the project site are low to medium, as the Columbia Square Complex buildings do not have brightly lit façades or entrances, with the exception of backlit wall signs attached to the Columbia Square Complex buildings near the intersections of Sunset Boulevard/El Centro Avenue and Sunset Boulevard/Gower Street. Light sources on the site also include exterior security lighting and pole-mounted lighting in the surface parking lot.

Sensitive receptors relative to glare include the existing residential uses to the east and motorists traveling on Sunset Boulevard. None of the Columbia Square Complex buildings generate substantial glare given their stucco finishes and narrow windows.

(4) Shade and Shadow

Given the number of mid- to high-rise building throughout the urban project area, shading is a common and expected phenomenon. Sensitive uses relative to shading impacts potentially generated by the project include the residential uses to the immediate east of the site across Gower Street. The project site is currently developed with one- to five-story buildings, which generate minimal shadows on off-site uses, particularly since the northern part of the project site is occupied by a surface parking lot. Additionally, none of the surrounding off-site buildings are sufficiently tall to cast shadows on the project site.

b. Regulatory Framework

(1) General Plan Framework

The Citywide General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan. The General Plan Framework provides direction regarding the City's vision for growth and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. Although the General Plan Framework does not directly address the design of individual neighborhoods or communities, it embodies broad neighborhood design policies and implementation programs to guide local planning efforts. The General Plan Framework also clearly states that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).[4]

As discussed further in Section IV.F, Land Use, of this Draft EIR, the Urban Form and Neighborhood Design Chapter establishes a goal of creating a livable city for existing and future residents with interconnected, diverse neighborhoods. "Urban form" refers to the general pattern of building heights and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood design" refers to the physical character of neighborhoods and communities within the City. With respect to neighborhood design, the Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

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[4] *City of Los Angeles General Plan Framework, page 5-14.*

Also within the General Plan Framework, the Open Space and Conservation Chapter calls for the use of open space to enhance community and neighborhood character. The policies of this chapter recognize that there are communities where open space and recreation resources are currently in short supply, and therefore suggests that pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.

Specific applicable objectives from the Urban Form and Neighborhood Design Chapter and the Open Space and Conservation Chapter are listed below in Table IV.A-1 on page IV.A-36 in the impact analysis section.

(a) City of Los Angeles Walkability Checklist for Site Plan Review

The City of Los Angeles Walkability Checklist for Site Plan Review (Walkability Checklist) is a pilot program created by the City's Urban Design Studio (a division of the Department of City Planning) that specifies urban design guidelines for projects required to undergo Site Plan Review. The Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form and is to be used by City planners to assess the pedestrian orientation of a project. The suggested design guidelines are consistent with the General Plan and supplement applicable Community Plan requirements, but are not considered mandatory. Guidelines address such topics as building orientation, building frontage, landscaping, off-street parking and driveways, building signage, and lighting within the private realm; and sidewalks, street crossings, on-street parking, and utilities in the public realm. A list of pedestrian-oriented design elements that the project would incorporate is provided in Table IV.A-2 on page IV.A-41 in the impact analysis section that follows.

(2) Hollywood Community Plan

The Hollywood Community Plan (Community Plan) is one of 35 community and district plans established for different areas of the City intended to implement the policies of the General Plan Framework. The most recent version of the Community Plan was adopted in December 1988.[5] While the primary aim of the Community Plan is to guide growth and development, several of the plan's objectives pertaining to land use also relate to aesthetic issues. For example, the plan calls for the compatibility of new development

[5] *The Hollywood Community Plan is currently in the process of being updated by the City of Los Angeles. The Draft EIR for the Hollywood Community Plan Update is expected to be completed and released in 2008.*

with existing commercial development and residential neighborhoods. The Community Plan also encourages the conservation of open space within the area. More specific to the project vicinity, the Community Plan recognizes an area, referred to as the Hollywood Center, as the focal point of the Hollywood Community. This area encompasses land on either side of Hollywood and Sunset Boulevards between La Brea Avenue and Gower Street, and thus includes the project site. The Community Plan intends for the Hollywood Center to serve as a commercial and entertainment center for Hollywood and beyond. Further discussion of the Community Plan is provided in Section IV.F, Land Use, of this Draft EIR.

(3) Los Angeles Municipal Code

The City of Los Angeles Planning and Zoning Code (Chapter 1 of the Los Angeles Municipal Code [LAMC]) sets forth regulations and standards regarding the allowable type, density, height, and design of new development projects. As discussed in Section IV.F, Land Use, the project site is currently zoned [Q]C4-1VL-SN. The "C4" portion of the zoning designation indicates that the project site is zoned for Commercial uses, while the "1VL" portion of the designation indicates that the site is within a Very Limited Height District No.1, which restricts building heights to a maximum of 45 feet and three stories. The "SN" portion of the zoning designation indicates that the project site is within the Hollywood Signage Supplemental Use District, discussed below. The Permanent [Q] Qualified Classification condition prohibits "residential uses…except as otherwise permitted in the industrial zone."

No setbacks (i.e., front, side, and rear yards) are required for commercial buildings in the C4 zone. Side and rear setbacks are required, however, for any portion of a building in the C4 zone that is used for residential purposes and must be provided at the floor level of the first story on which residential uses are present. Required setbacks in such instances are in accordance with R4 zoning requirements and generally vary from 5 to 16 feet for side yards and 15 to 20 feet for rear yards, depending upon building height. Similarly, while there are no lot area requirements for commercial uses in the C4 zone, residential uses therein are subject to a minimum lot width of 50 feet, a minimum lot area of 5,000 square feet, and a minimum lot area per dwelling unit of 400 square feet. Additionally, the floor area ratio (FAR) for the site is currently limited to 1.5:1.

Relative to lighting, the LAMC specifies that outdoor light standards, specifically those used to illuminate a parking area, must be designed to reflect the light away from any adjacent street or property. In addition, exterior lighting may not generate direct glare or a light intensity greater than two foot-candles onto specified habitable and/or recreational uses. Further, signage illumination is limited to a light intensity of three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property. As it also pertains to this analysis, additional LAMC requirements regulate such

aspects of development as the design of parking facilities, fences, and walls. LAMC requirements relating to land use controls are discussed in Section IV.F, Land Use.

(4) Hollywood Signage Supplemental Use District

The project site is located within the Hollywood Signage Supplemental Use District (HSSUD) per City Ordinance No. 176172. The purposes of the HSSUD are the following: to promote appropriate and economically viable signage; to limit visual clutter by regulating the number, size, and location of signs; to minimize potential traffic hazards and protect public safety; to protect street views and scenic vistas of the Hollywood Sign and the Hollywood Hills; and to protect and enhance major commercial corridors and properties. As specified in the ordinance, the HSSUD promotes signage that uses clear attractive graphics; coordinates with the architectural elements of the building on which the signage is located; reflects a modern vibrant image of Hollywood as the global center of the entertainment industry; and complements and protects the character-defining features of historic buildings. Specifically, permitted signage types include architectural ledge signs, awning signs, electronic message displays, information signs, marquee signs, monument signs, open panel roof signs, pedestrian signs, pillar signs, projecting signs, and/or skyline logos/icons, as well as certain temporary signs. It is noted that the HSSUD specifies permitted locations for electronic message displays, including Sunset Boulevard between Cahuenga Boulevard and Gower Street, which includes the project site frontage along Sunset Boulevard.

(5) Community Redevelopment Agency Hollywood Redevelopment Plan

The Community Redevelopment Agency (CRA) Hollywood Redevelopment Plan (Redevelopment Plan) was adopted by the City Council on May 7, 1986 and most recently amended on October 31, 2003. The Hollywood Redevelopment Project Area (Redevelopment Area) encompasses approximately 1,107 acres bounded approximately by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The Redevelopment Plan supports the California Community Redevelopment Law and as such, is designed to improve economically and socially disadvantaged areas, redevelop or rehabilitate under or improperly utilized properties, eliminate blight, and improve the public welfare. More specifically, as it relates to this analysis, the goals established in the Redevelopment Plan include reviving the historic core of the area, preserving historically significant structures, and recommending urban design guidelines. Applicable goals and requirements are listed in Table IV.A-3 on page IV.A-48 in the impact analysis section. Further discussion of the Redevelopment Plan and related goals and objectives is provided in Section IV.C, Historic Resources, and Section IV.F, Land Use, of this Draft EIR.

(6) Community Redevelopment Agency Design for Development for Signs in Hollywood

CRA's Design for Development for Signs in Hollywood (DFD), revised and amended in October 2007, largely mirrors the HSSUD and formalizes CRA's approval authority over signage located within the Hollywood Redevelopment Area. The general purposes of the DFD are identical to the HSSUD, with the addition of a specific goal to promote the removal of billboards and pole signs in the area in order to reduce visual clutter. In instances where the provisions of the DFD are more restrictive than those of the HSSUD or LAMC, the DFD provisions prevail. As with the HSSUD, billboards and pole signs are not permitted though legally non-conforming signs that pre-date the DFD and HSSUD may remain. In addition, the DFD specifically designates certain areas, including Sunset Boulevard between Cahuenga Boulevard and Gower Street, as electronic message display areas.

3. Project Impacts

a. Methodology

(1) Aesthetics/Visual Quality

This analysis considers the visual quality of the area immediately surrounding the project site and the impacts of the project with respect to the existing aesthetic environment. The project's development characteristics and conceptual illustrations are used to support the analysis of aesthetics/visual quality, which is based on the following three-step process:

- Step 1: Describe the massing and general proportion of buildings and open space, and proposed treatments around the project edges, which may be anticipated on the basis of the project's design features. The maximum building heights and mass are assumed in the evaluation.

- Step 2: Compare the expected appearance to the existing site appearance and character of adjacent uses and determine whether and/or to what extent a degrading of the visual character of the area could occur (considering factors such as the blending/contrasting of new and existing buildings given the proposed uses, density, height, bulk, setbacks, signage, etc.); and

- Step 3: Compare the anticipated appearance of the project to standards within existing plans and policies which are applicable to the project site (regulatory analysis).

(2) Views

The analysis of views addresses the changes to existing views that may result from development of the project. The intent of the analysis is to determine if view resources exist and are visible in the project area and whether visual access to such resources would be blocked or diminished by the project. "Focal views" focus on a particular object or building of visual interest, while "panoramic views" are vistas that provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. The determination of significance is based on whether view blockages of visual resources would occur. The determination of significance is also based on the type of land uses that would experience view blockages. View blockages from public places, such as designated scenic highways, corridors, parkways, roadways, bike paths and trails, are considered significant under the *City of L.A. CEQA Thresholds Guide (2006)*. In addition, although not protected under CEQA, this impact analysis conservatively considers private views from residential buildings as significant, since a resident's expectations concerning views may be similar to public expectations of view access from public places. Specifically, due to the proximity of the project to the Hollywood Hills, this evaluation addresses private view impacts relative to distant and panoramic views of the urban landscape from private residences in the hills. However, private views from other uses such as office buildings or other private sites are not considered in this analysis**.**

The views analysis is based on the evaluation of simulated composite photographs showing existing and future conditions from representative locations within a range of distances and variety of directions from the project site. Most of the view locations are within a two-block radius, with one simulated photograph showing a panoramic view of the project site and surrounding cityscape from the Hollywood Hills at North Sycamore Avenue, approximately 2.4 miles northwest of the project site. Consistent with the *City of L.A. CEQA Thresholds Guide (2006),* the analysis of views is based on a five-step process as follows:

- Step 1: Define the view resources.
- Step 2: Identify the potential obstruction of view resources as a result of development of the project site. An assumption is made that any obstruction of a resource would constitute a change in the environment and would be considered an adverse impact regardless of effect on the overall view.
- Step 3: Evaluate whether a potential obstruction would substantially alter the view. The "substantiality" of an alteration in viewing is somewhat subjective and dependent on many factors. In this case, an obstruction of the view of a particular view resource was considered substantial if it exhibited the following traits: (1) the area viewed contains a view resource; (2) the obstruction of the

resource covers more than an incidental/small portion of the resource; and (3) the obstruction would occur along a public view area.

- Step 4: Consider whether the project includes design features that offset the alteration in views or loss of views of a particular valued view resource.

- Step 5: Consider whether the blockage is permanent, as viewed from an occupied residence or scenic vantage point; or whether the blockage would be momentary, as viewed by a mobile pedestrian or from a vehicle.

(3) Light/Glare

The analysis of light and glare identifies the location of light-sensitive land uses and describes the existing ambient conditions on the project site and in the project vicinity. The analysis describes the project's proposed light and glare sources, and the extent to which project lighting, including illuminated signage, could spill off the project site onto adjacent light-sensitive areas. The analysis also describes the affected street frontages, the direction in which the light would be focused, and the extent to which the project would illuminate sensitive land uses. The analysis also considers the potential for sunlight to reflect off of building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities.

(4) Shading

The consequences of shadows on land uses can be positive, including cooling effects during warm weather; or negative, such as loss of warmth during cooler weather and natural light. Shadow effects are dependent on several factors, including local topography, the height and bulk of a project's structural elements, sensitivity of surrounding uses, season, and duration of shadow projection. In determining the effects of shading, the locations of shadow sensitive uses (such as residential uses, recreational areas, and schools) in the surrounding area are identified and the shading effects are modeled according to standard criteria. Impacts are modeled based on the proposed building heights and building footprints as well as the distance.

Shading impacts are evaluated in accordance with the *City of L.A. CEQA Thresholds Guide (2006)*. Shadows have been modeled and plotted for representative hours during the spring and fall equinoxes and winter and summer solstices. Residential, cultural, educational, and hotel uses where routinely used outdoor recreation areas as well as solar collectors associated with multi-family residences and institutional uses may occur, and where sunlight may be important to physical comfort or function, are considered sensitive uses. The *City of L.A. CEQA Thresholds Guide (2006)* significance criteria apply to the shadows occurring between 9:00 A.M. and 3:00 P.M. during the winter and between

the hours of 9:00 A.M. and 5:00 P.M. during the spring, summer and fall.[6] Shading patterns are determined for the following periods:

Season	Date	Time of Day
Winter Solstice	December 21	9 A.M. PST to 3 P.M. PST
Spring Equinox	March 21	9 A.M. PDT to 5 P.M. PDT
Summer Solstice	June 21	9 A.M. PDT to 5 P.M. PDT
Fall Equinox	September 21	9 A.M. PDT to 5 P.M. PDT

The varying and seasonally adjusted daytime hours represent the period of the day in which the expectation of available sunlight exists. For the purpose of establishing the hours in which significant impacts occur, winter is described as occurring during Pacific Standard Time (PST), which occurs between early November and early March, and spring, summer and fall are described as occurring during Pacific Daylight Time (PDT), which occurs between early March and early November.

b. Significance Thresholds

According to the *City of L.A. CEQA Thresholds Guide (2006)*, the determination of significance shall be made on a case-by case- basis, considering the following factors:

Aesthetics/Visual Quality

- The amount of relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered, or demolished;
- The amount of natural open space to be graded or developed;

[6] *Timeframes have been adjusted from those specified in the L.A. CEQA Thresholds Guide (2006) to account for the new Daylight Savings time period (second Sunday in March through the first Sunday in November), which went into effect in 2007 (per the Energy Policy Act of 2005) to reduce energy consumption. Prior to this change, the spring equinox occurred within Daylight Standard Time and was therefore subject to shading analysis between the hours of 9:00 A.M. and 3:00 P.M.*

- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc;

- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;

- The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements;

- The degree to which the project would contribute to the area's aesthetic value; and

- Applicable guidelines and regulations.

Views

- The nature and quality of recognized or valued views (such as natural topography, settings, manmade or natural features of visual interest, and resources such as mountains or the ocean);

- Whether the project affects views from a designated scenic highway, corridor, or parkway;

- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and

- The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail as opposed to a single, fixed vantage point.

Light/Glare

- The change in ambient nighttime levels as a result of project sources; and

- The extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

Shading

- Whether the project would 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 to the north, northwest, or northeast.

(1) Aesthetics/Visual Quality

Based on the factors set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, the project would have a significant impact on aesthetics/visual quality if:

- The project would substantially alter, degrade or eliminate the existing visual character of the area, including visually prominent existing features or other valued resources;
- The project features would substantially contrast with the visual character of the surrounding area and its aesthetic image; or
- Implementation of the project would preclude the attainment of existing aesthetics regulations or applicable plans.

(2) Views

Based on the factors set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, the project would have a significant impact on views if:

- Project development would substantially obstruct an existing view of a visually prominent resource as viewed from a public street, sidewalk, park, community cultural center, trail, or public vantage point.

(3) Light/Glare

Based on the factors set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, the project would have a significant light and glare impact if:

- Project lighting would substantially alter the character of the off-site areas surrounding the project; or
- Lighting or glare would substantially interfere with the performance of an off-site activity.

(4) Shading

Based on the factors set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, the project would have a significant shading impact if:

- Shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard

Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).

c. Project Design Features

As described in Section II, Project Description, of this Draft EIR, the Columbia Square project would provide a vertically integrated mix of uses that will assist in promoting Hollywood as a center of population, employment, retail services and entertainment. Specifically, the project would provide 400 residential units, a 125-room hotel, approximately 380,000 square feet of office space, and 41,300 square feet of retail and restaurant/bar uses (including restaurant/bar use in the hotel) on a 4.68-acre site. Included within these project uses is approximately 105,510 square feet of the 136,233-square-foot Columbia Square Complex that would be rehabilitated to the Secretary of Interior Standards to provide for approximately 91,110 square feet of office uses and 14,400 square feet of retail and restaurant/bar uses.

In addition, a substantial part of the project would include landscaped courtyards, pathways and other open space features connecting the various uses in order to establish a pedestrian-oriented environment within the project vicinity. Amenities for project residents would include fitness and recreation rooms, large central courtyards and gardens, two swimming pools, entertaining patios, sunning areas, and landscaped recreational areas. With the exception of the pocket park located in the northeast corner of the project site (at the corner of Selma Avenue and Gower Street) and the plaza and associated courtyard located within the southern portion of the project site (north and adjacent to Sunset Boulevard), public open space areas would generally be located on the podium level.

Further, the project would include a nine-level parking facility (including three subterranean levels) providing approximately 2,004 parking spaces. The parking facility would be physically integrated with surrounding development within the interior of the site such that it would be surrounded by the residential tower to the west, the townhomes to the north, the office and townhomes to the east, and the existing buildings to the south and therefore, would generally not be visible from surrounding areas. Please refer to Figure II-3 in Section II, Project Description, of this EIR for an illustration of the proposed site plan.

To accommodate the proposed uses, Studio B/C associated with the Columbia Square Complex would be removed.

As discussed in detail in Section IV.F, Land Use, of this Draft EIR, the project would require several discretionary actions affecting the development and design of the project.

These include, but are not limited to: Community Redevelopment Agency (CRA) Board Approval to develop up to 5.42:1 FAR; CRA Board approval of a Owner Participation Agreement; City approval of a Development Agreement; a General Plan Amendment to permit the Regional Center Commercial land use designation in lieu of the existing Commercial Manufacturing designation and to permit a floor area ratio of 5.42:1; approval of a Development Agreement, a Vesting Zone Change and Height District Change to change the existing [Q]C4-1VL-SN Zone to C4-2-SN; multiple conditional use permits (CUP); site plan review; City Planning Commission approval for a phased development; zone variance to permit a restaurant with outdoor eating area not on the ground level; Vesting Tentative Tract Map; and signage approvals.

(1) Proposed Building Design and Placement

Figures IV.A-4, IV.A-5, and IV.A-6 on pages IV.A-23 through IV.A-25 provide illustrations of the project from various vantage points. As shown, the project would introduce a mix of uses with varied building styles and scales and substantial site landscaping. Figure IV.A-7 on page IV.A-26 provides an illustration of the placement and overall massing of the project structures. A description of the various project components is provided below.

As described in Section II, Project Description, the residential component of the project would consist of several buildings ranging in height from eight to 40 stories sited in the northern portion of the site along El Centro Avenue, Selma Avenue, and Gower Street. The top floor of the 40-story residential tower, located in the northwest corner of the project site, would reach a building height of approximately 447 feet, with other elements such as the helipad extending to approximately 487 feet and architectural features extending to approximately 512 feet. Please refer to Figure IV.A-7, wherein the cited building heights represent the top of the uppermost habitable floor (i.e., 447 feet), and the top floor/rooftop features are shown in bulk to illustrate the maximum building height. Town homes would be located within the eight-story building located along Selma Avenue, as well as on the top two stories (7th floor and 8th floor) of the eight-story building fronting Gower Street, above proposed office uses.

The project's hotel component would comprise the first seven stories (75 feet in height) of the residential tower located along El Centro Avenue just south of and below the residential tower. Amenities including a swimming pool and landscaped recreational areas for guests would be provided on the podium level.

The proposed office uses would be located within buildings ranging in height from one to 14 stories, located primarily in the southern portion of the project site along El Centro Avenue, Sunset Boulevard, and Gower Street. A 14-story high-rise office

Columbia Square

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Figure IV.A-4
Conceptual Project Development
Sunset Boulevard

Source: Johnson Fain, 2008

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Figure IV.A-5
Conceptual Project Development
Aerial View

Source: Ian Espinoza Associates, 2007

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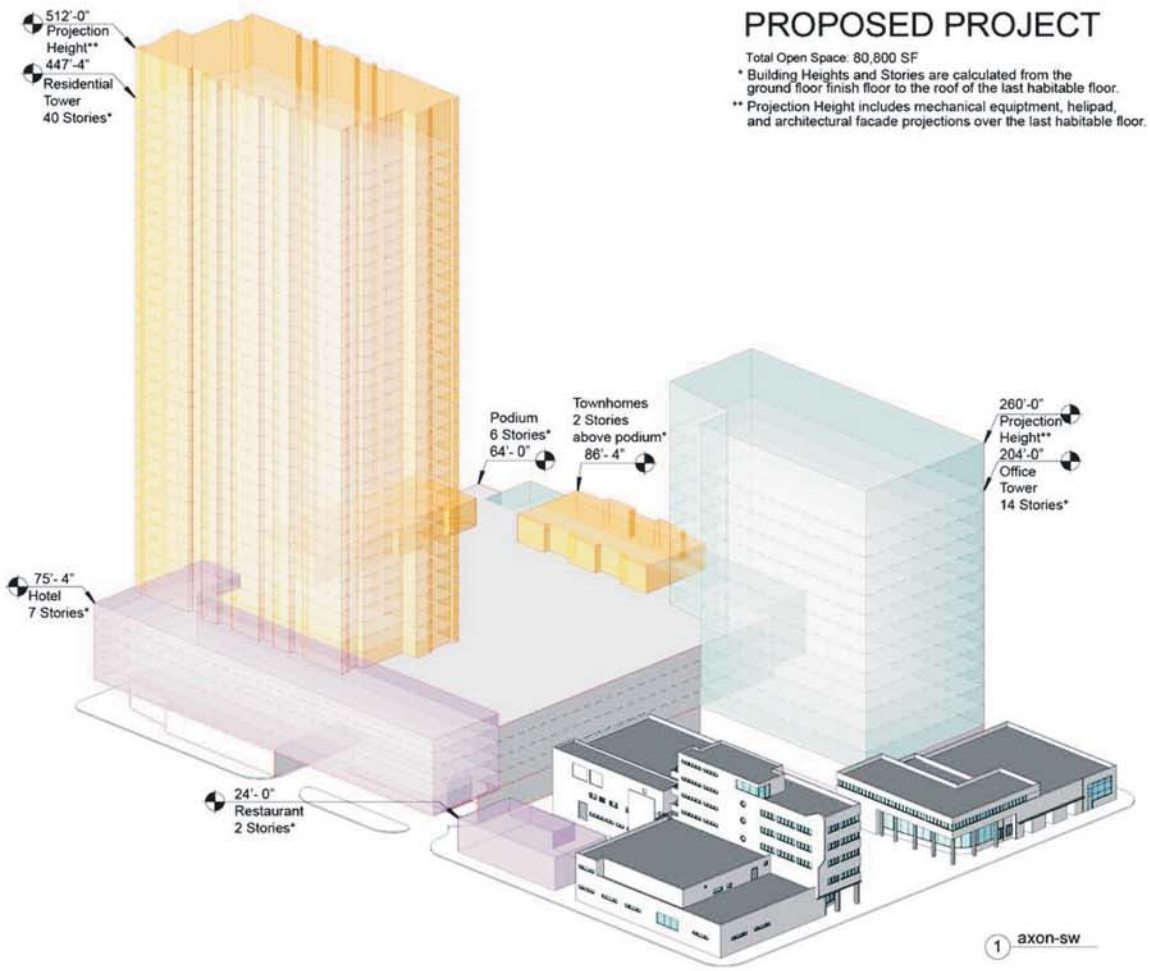
Figure IV.A-6
Conceptual Project Development
Selma Avenue and Gower Street

Source: Ian Espinoza Associates, 2007



Columbia Square

Figure IV.A-7
Building Massing Diagram

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Source: Johnson Fain International, Inc., September 2008

building would be located near the southeast corner of the site along Gower Street and would be approximately 204 feet tall, with other elements such as the helipad extending to approximately 224 feet and rooftop equipment extending to approximately 260 feet. In addition, office uses would be located on the first six floors of the eight-story building proposed along Gower Street, described above. The existing Radio Building, Studio A, and Television Building of the Columbia Square Complex fronting Sunset Boulevard would remain and would be rehabilitated for some office use as shown on Figure II-3 in Section II, Project Description.

Retail uses and a café would be located on the ground floor of the 14-story office building. A two-story restaurant is also proposed near the southwest portion of the project site along El Centro Avenue adjacent to the hotel porte-cochere. In addition, retail and restaurant/bar uses would be provided as part of the hotel on the ground-floor and on the podium level (7th floor) of the residential tower. The location of the pedestrian-oriented retail uses and café on the ground level of the proposed office building, as well as the proposed ground level retail and two-story restaurant, would complement the off-site commercial, retail, and office uses located along Sunset Boulevard, Gower Street, and El Centro Avenue.

The project would also include a nine-level parking facility with 2,004 parking spaces, located within the central portion of the site. The three lower levels of the parking facility would be subterranean, while the six upper levels would begin at ground level and form the podium upon which the residential tower and town homes would be located (the podium level would thus comprise the 7th floor of proposed development). Vehicular access to the parking facility would be provided at El Centro Avenue, Selma Avenue, and Gower Street. As previously mentioned, the parking structure would be physically integrated with surrounding development within the interior of the site such that the structure would be surrounded by the residential tower to the west, town homes to the north, and office uses and town homes to the east and, therefore, generally would not be visible from off-site locations.

(2) Rehabilitation of Existing Buildings

As part of the project, three of the four existing Columbia Square Complex buildings (or approximately 105,510 square feet of the 136,233-square-foot Complex) would be rehabilitated to provide for approximately 91,110 square feet of office uses and 14,400 square feet of retail and restaurant/bar uses. Rehabilitation of the Radio Building (1st Wing), Studio A (2nd Wing), and the Television Building (3rd Wing), as well as the Sunset Courtyard (discussed further below), would conform to the Secretary of the Interior Standards. The functionality of the rehabilitated structures would be fully integrated with that of the other structures proposed on-site, and extensive landscaping, open space, and pedestrian links would be introduced to connect and integrate all elements of the project.

To this end, the project has been designed to acknowledge the history of the site while building on it for the future. The fourth building that houses Studio B/C would be removed and replaced by the 14-story office building along Gower Street.

(3) Architectural Design and Materials

The project would be designed to provide visual interest through variations in building height, bulk, massing, and design. The site layout and architectural style of the new structures, featuring clean lines and a contemporary urban architecture, are intended to complement the Columbia Square Complex buildings that will remain. The project design also reflects a transition in building height with regard to the existing historic structures and the surrounding neighborhood's character. The transitional heights of the project would maintain the existing low-rise buildings in the southern portion of the site, permit mid- to high-rise buildings throughout the central and northern portions of the site, and concentrate the tallest component of the project in the northwest corner of the site, furthest from Sunset Boulevard, the remaining Columbia Square Complex buildings, and existing off-site residential uses to the east. The location of the office tower, situated behind (north of) one of the existing Columbia Square Complex buildings on Sunset Boulevard, would retain and respect the project site's historic façades along Sunset. Additionally, the driveways along Gower Street would not align with Harold Way to the east, thus discouraging project traffic from using the nearby residential streets to access the site. Further, the project would align the proposed buildings in a way that permits a variety of long-range views for building occupants.

The proposed buildings would be treated with contrasting but complementary colors, building plane variations, a variety of building materials, planters, and other landscape elements. Multiple surface reliefs and architectural extensions would also be incorporated into the buildings' façades, including parapets and varied rooflines. Architectural materials would likely include items such as varying spandrel glass, clay/terracotta rain screen tiles, stainless steel cable balcony railing, and architectural smooth finish concrete. In addition, rooftop architectural/screening features would be used to obscure rooftop equipment such as mechanical structures, satellite dishes, and the required helipad from view.[7]

[7] *Division 118 of the Los Angeles Fire Code requires a rooftop emergency helicopter landing facility for all new high-rise buildings greater than 75 feet in height.*

(4) Recreation, Open Space, and Landscape Plan

The project would provide substantial open space, landscaping and amenities for project residents, guests and tenants, as well as for the general public. Publicly accessible landscaped open space would consist of two public courtyards and a pocket park on the ground level. One of the public courtyards would consist of the existing courtyard (Sunset Courtyard) fronting Sunset Boulevard that is a part of the Columbia Square Complex. As part of the project, this courtyard would be renovated, re-landscaped, and reintroduced as a new pedestrian-oriented amenity for the greater community. More specifically, the new courtyard would connect to other green spaces on-site and create a walkable district, enabling residents and visitors to walk through and enjoy a vast majority of the project site. The second courtyard would be located at the northwest corner of the site and would be enhanced with pedestrian pathways and accent paving. The pocket park would be located in the northeast portion of the project site (at the corner of Selma Avenue and Gower Street). Additional amenities provided for project residents and/or guests would include fitness and recreation rooms, large central courtyards and gardens on the podium level, two swimming pools, entertaining patios, and sunning areas. Overall, the project would provide a total of approximately 76,400 square feet of open space consisting of approximately 59,000 square feet of active and passive common open space and approximately 17,400 square feet of private open space, amounting to approximately 40 percent of the project site.

Landscape plans for the ground and podium levels are provided in within Section II, Project Description. As shown, landscaping including ornamental trees would be provided along the perimeter of the site as well along pedestrian walkways integrated throughout the project site. In addition, the plaza along Sunset Boulevard, as well as the podium level adjacent to the two proposed swimming pools would be landscaped. The ground level of nearly all of the buildings would include pedestrian links to the surrounding environs, as well as to the interior common recreation areas. Multiple access points and a mix of landscaped public and private open space, including several courtyards and the pocket park, would connect and integrate all elements of the project. Pathways will be defined and open to pedestrians traversing the block or connecting to elements within it. The proposed landscape plans would provide for an estimated 19 percent increase in landscaped area on-site compared to existing conditions, thereby increasing green space and pervious surface area.[8]

[8] *This increase takes into account landscaping/pervious open space both on the ground level (22,210 square feet or approximately 11 percent of the lot area) and the podium level (19,970 square feet or approximately 10 percent of the lot area), for a project total of 42,180 square feet of potentially pervious landscaping or approximately 21 percent of the total project site area. The project site currently includes 1.8 percent of pervious landscaping. Thus, the project would result in an estimated 19 percent increase in landscaped area on-site.*

(5) Signage and Lighting

As discussed above, the Hollywood Signage Supplemental Use District (Ordinance No. 176172) was enacted to acknowledge and promote the continuing contribution of signage to the distinctive aesthetic of Hollywood Boulevard, as well as control the blight created by poorly placed and badly designed signs throughout the Hollywood area. The project is located within and is thus subject to the HSSUD. Proposed signage would include general ground level and wayfinding pedestrian signage, as permitted per the HSSUD and CRA's Design for Development for Signs in Hollywood. The seven existing backlit wall signs attached to the Columbia Square Complex buildings are anticipated to be replaced with wall art, located along the building façades near the corner of Sunset Boulevard and El Centro Avenue, as illustrated in Figure IV.A-4. In addition, an artistic wall element may be introduced along the southern façade of the proposed hotel, as also illustrated in Figure IV.A-4. Any such signage would comply with all applicable regulatory requirements, including those set forth in the HSSUD, DFD, and/or the City's sign ordinance (Los Angeles Building Code, Chapter 62). The existing 53-square-foot pole sign located on-site would be removed as part of the project. The total area of project signage would be well within the permitted area of four square feet per foot of street frontage, which allows for approximately 7,500 square feet of signage on-site.

Project lighting would include low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes. In addition, outdoor lighting associated with future studio use could be utilized on occasion at the site. Low-level lighting to accent signage, architectural features, and landscaping elements would also be incorporated throughout the site. On-site exterior lighting would be shielded or directed toward areas to be lit to limit spill-over onto adjacent residential uses. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would be approved by the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties.

d. Analysis of Project Impacts

(1) Aesthetics/Visual Quality

(a) Short-term Construction

Construction activities generally cause a contrast to and disruption in the general order and aesthetic character of an area. During construction, the project site's visual appearance would be altered due to the removal of existing structures, site preparation and grading, and the construction of project buildings and landscaping. Additionally, equipment

and materials may be staged on-site and temporary facilities, such as portable toilets and construction offices, may be located on-site. Construction activities for the project would be visible to adjacent land uses as well as pedestrians and motorists on adjacent streets. Temporary fencing would be placed along the periphery of the site to screen much of the on-site construction activity from view from the street level.

Project construction activities may require the removal of several mature street trees bordering the site, which would reduce the visual quality of adjacent streets during the construction period. However, the project's proposed landscape plan would replace all removed street trees and increase overall landscaping features. Since the loss of street trees would be temporary and such trees would ultimately be replaced, the removal of street trees during construction would not substantially alter, degrade or eliminate the existing visual character of the area.

Visible construction activities would also include truck traffic to and from the site. However, the impact of construction trucking would not significantly impact the visual quality of the area, since the local major roadways are intended to accommodate a range of vehicle types, including trucks incidental to construction and deliveries. Furthermore, construction-related visual impacts would only occur on a short-term basis. Thus, with incorporation of Mitigation Measure A-1, construction-related visual quality impacts would be less than significant.

(b) Operation

Implementation of the project would replace Studio B/C and the associated surface parking lot with a denser configuration of new buildings integrated by landscaped courtyards and pedestrian walkway areas. As shown in Figures IV.A-4 through IV.A-6, the project would provide a mixed-use site with varied residential, business, and community-serving commercial uses. As described in Section IV.F, Land Use, the project's uses would be compatible with the residential uses to the northeast and east of the site, as well as the surrounding commercial uses along Sunset Boulevard and other neighboring streets. The project's extensive landscaping, particularly within the renovated courtyard along Sunset Boulevard, would enhance the appearance of the site and, in conjunction with ground floor retail uses throughout the site, would promote pedestrian activity in the area. Furthermore, the project's increase in density and building height would be in character with the area given the nature of other new high-density development recently completed and/or underway throughout the vicinity. Thus, the project would not degrade the visual character of the project site. Nonetheless, the project would substantially alter some of the valued visual resources on-site and would introduce elements that contrast with the current aesthetic image of the site and neighborhood, as discussed further below.

As previously described, the existing Columbia Square Complex buildings are considered historic resources under CEQA. As discussed in Section IV.C, Historic Resources, of this Draft EIR, the removal of Studio B/C (4th Wing) of the Columbia Square Complex constitutes a significant adverse change to a historic resource. However, the Radio Building, Television Building, and Studio A along Sunset Boulevard would be rehabilitated in accordance with the Secretary of Interior Standards. As also discussed in Section IV.C, Historic Resources, the location of the new office building that would replace Studio B/C would not provide adequate distance from the remaining historic buildings. The size and scale of the office building would significantly alter historic spatial relationships and the experience of the Columbia Square Complex from its public spaces. As such, the contrast in size and scale introduced by project development relative to the existing historic buildings on-site would be considered a significant aesthetic impact.

The proposed improvements to the Sunset Courtyard along Sunset Boulevard would conform to the Secretary of the Interior Standards and would be considered a beneficial impact relative to aesthetics as this courtyard would be renovated, re-landscaped, and reintroduced as a new pedestrian-oriented amenity for the greater community, thus enhancing the appearance of the site. The new courtyard would connect to other green spaces on-site and create a walkable district, enabling residents and visitors to walk through and enjoy much of the project site. Aesthetic impacts associated with renovation of the Sunset Courtyard would therefore be less than significant.

The project would include attractive lighting, for purposes of providing security and aesthetic enhancements, while also being sensitive to nearby properties (refer to the analysis of lighting impacts later in this section for further discussion). Additionally, the substantial increase in landscaping and the creation of pedestrian paths throughout the site would improve the character of the site. While the existing sense of openness embodied within the central portion of the site would be eliminated, the current parking lot is not a natural open space and therefore, its redevelopment does not constitute the removal of a valued visual resource. Further, the project would create new open spaces with landscaping, particularly on the podium level where a recreation area and amenities would be provided for project residents and guests.

Relative to surrounding development, as previously discussed, a somewhat non-cohesive visual character is evident throughout the project area due to the eclectic nature of existing land uses and their associated variations in architecture, building heights and materials. Further, the project area continues to grow and transform, with new and ongoing development incorporating dense mixed uses with mid- and high-rise buildings. Nonetheless, given the proximity of the Selma-La Baig Historic District, which consists of a neighborhood of primarily one-story single-family Craftsman style residences, project development would introduce a substantial degree of contrast with the aesthetic image associated with the nearby historic district. More specifically, the greater size, scale, mass

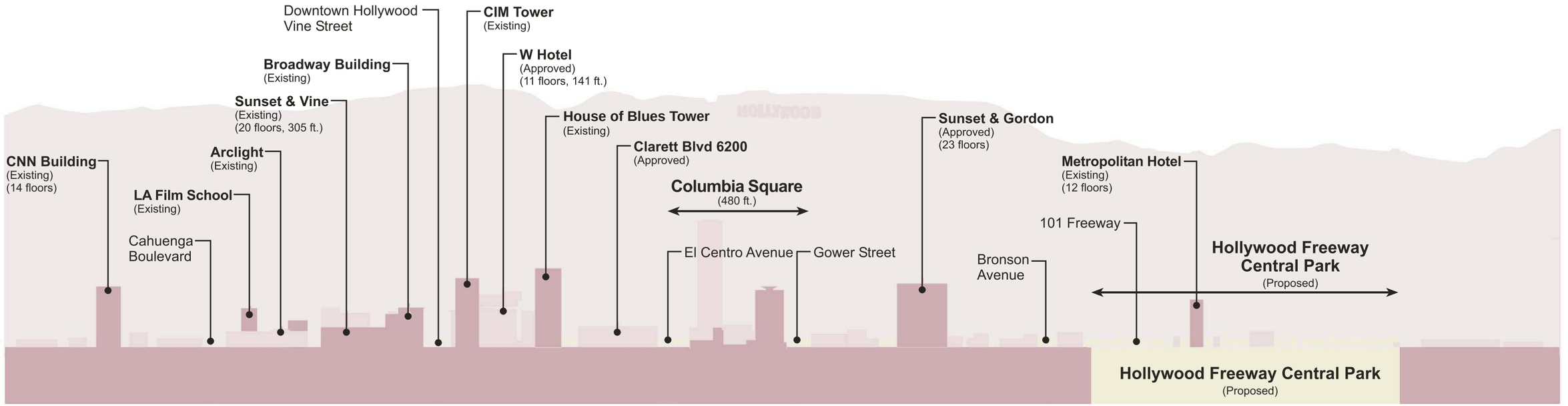
and density of the project would be highly visible from various streets and properties to the east, including those within the district (Harold Way, Selma Way, and La Baig Avenue), thus altering the visual context of the neighborhood (refer to the photo simulations in the views analysis below for further details). Presently, due to the low profile of much of the surrounding context, the visual character of the historic district is still predominant and intact. As such, the visual contrast introduced by the project relative to the adjacent residential neighborhood would be considered a significant aesthetic impact.

Despite the increase in building height and density, the project would not contrast sharply with surrounding commercial and mixed-use development or other more distant properties. Refer to Figure IV.A-8 on page IV.A-34 and Figure IV.A-9 on page IV.A-35 for silhouette drawings of the project in the context of the neighboring Hollywood skyline. Figure IV.A-8 depicts the project and surrounding properties along an east-west axis, as viewed looking north, and demonstrates that while the height of the residential tower would be evident, the proposed building massing and density would not differ substantially from other nearby developments. Similarly, in Figure IV.A-8, taken along a north-south axis and viewed to the west, the bulk and density of the project appears compatible with that of surrounding properties. The project's vertical vernacular would provide a transition between the surrounding commercial uses while allowing for a higher density development within the site. The project would be designed to provide substantial and striking visual interest, since all of the buildings would vary in height, bulk and massing, thus creating an identity that is distinctive yet compatible with surrounding uses. The project would also incorporate design elements with an architectural theme that complements the existing character of the Sunset Boulevard commercial corridor. Further, project parking has been designed in a manner that would render it generally hidden from off-site public views, with the exception of driveway entrances and exits. As such, the aesthetic impact of the project relative to surrounding commercial and mixed use development would be less than significant.

(c) Consistency with Regulatory Framework

(i) General Plan Framework and Hollywood Community Plan

As shown in Table IV.A-1 on page IV.A-36, the project would be consistent with applicable policies set forth in the City's General Plan Framework. Specifically, the project would: introduce new development, contemporary architecture, and modern amenities within an older site; promote pedestrian activity by creating a mixed-use site; enhance the livability of the neighborhood by renovating the site, specifically by removing an existing surface parking lot and introducing a synergistic mix of uses, including office, retail, residential, and hotel uses; and relandscaping elements of the public realm. Additionally, the project would support Community Plan objectives to promote the Hollywood Center, in which



View looking north, “Sunset Studio District” and Hollywood Hills.

Columbia Square

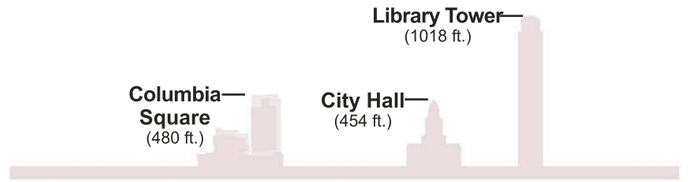
Hollywood

Columbia Square

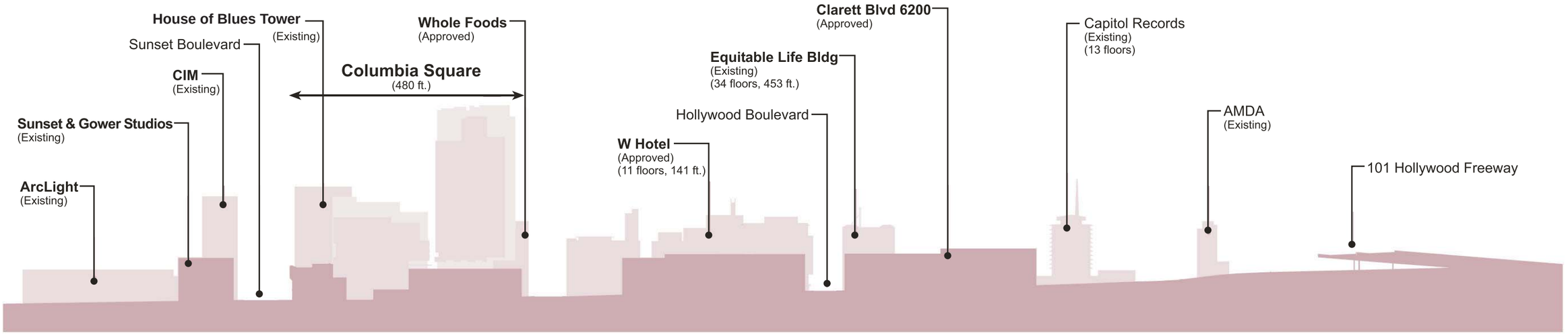
matrix environmental

Figure IV.A-8
Hollywood Skyline
Sunset Studio District (North View)

Source: Roschen Yan Cleve Architects, 2008



Relative Height Comparisons



View looking west, “Downtown Hollywood” beyond (Vine Street).

Columbia Square

Hollywood

“Downtown Hollywood” and Hollywood Hills.

matrix environmental

Figure IV.A-9
Hollywood Skyline
Downtown Hollywood (West View)

Source: Roschen Yan Cleve Architects, 2008

Table IV.A-1
Consistency of the Project with Applicable Provisions
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Land Use Chapter	
Goal 3L: Districts that promote pedestrian activity and provide a quality experience for the City's residents.	**Consistent.** The project would improve the existing pedestrian environment by creating a mixed-use development with street frontage improvements. The project's design would include outdoor walkways, public courtyards and a garden, as well as common spaces incorporating landscaping and open space amenities, to encourage pedestrian activity.
Urban Form and Neighborhood Design Chapter	
Policy 5.2.2: Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime (see Chapter 3: Land Use). Additionally, develop these areas so that they are compatible with surrounding neighborhoods, as defined generally by the following building characteristics. c. The built form of regional centers will vary by location. In areas such as Wilshire and Hollywood Boulevards, buildings will range from low- to mid-rise buildings, with storefronts situated along pedestrian-oriented streets. In areas such as Century City and Warner Center, freestanding high rises that are not pedestrian-oriented characterize portions of these centers. Nevertheless, regional centers should contain pedestrian-oriented areas, and incorporate the pedestrian-oriented design elements defined in Policy 5.8.1 and Policies 3.16.1 - 3.16.3.	**Consistent.** As discussed in Section IV.F, Land Use, the project site is located within a designated Regional Center area which serves as "a focal point of regional commerce, identity and activity, containing a diversity of uses." The project would enhance this designation through the creation of a mixed-use development with low-, mid- and high-rise buildings integrated with pedestrian amenities such as outdoor walkways, public courtyards and a garden in order to create a vibrant community. Further, the project's location in proximity to public transit would provide opportunities for the use of alternative modes of transportation.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**Consistent.** The project would provide a mixed-use site with varied residential, business, and community-serving commercial uses. The project would also include landscaped courtyards and other open space areas to serve the recreational needs of residents and guests.

Table IV.A-1 (Continued)
Consistency of the Project with Applicable Provisions
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Policy 5.7.1: Establish standards for transitions in building height and for on-site landscape buffers.	**Consistent.** The project design reflects a transition in building height with regard to the existing historic structures and the surrounding neighborhood's character. The transitional heights of the project would maintain the existing low-rise buildings along Sunset Boulevard and concentrate the tallest component of the project in the northwest corner of the site, furthest from Sunset Boulevard, the remaining Columbia Square Complex buildings, and existing off-site residential uses to the east. Additionally, landscaping would be used throughout open space areas on the ground and podium levels to foster an inviting pedestrian environment.
Objective 5.8: Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.	**Consistent.** The project would include landscaped pedestrian walkways and courtyards throughout the site for the general public as well as project residents/guests. In particular, the existing Sunset Courtyard fronting Sunset Boulevard that is a part of the Columbia Square Complex would be renovated and reintroduced as a new pedestrian-oriented amenity for the greater community, connecting to other green spaces on-site and creating a walkable district. The project would include the development of new residential units, a hotel, offices, and community-serving retail and restaurant uses. This proposed mix of uses would facilitate pedestrian access to local shopping and dining opportunities for project residents and visitors. Further, the integrated mix of uses will assist in promoting Hollywood as a center of population, employment, retail services, and entertainment.
Policy 5.8.1: Buildings in pedestrian-oriented districts and centers should have the following general characteristics: a. An exterior building wall high enough to define the street, create a sense of enclosure, and typically located along the sidewalk; b. A building wall more-or-less continuous along the street frontage; c. Ground floor building frontage designed to accommodate commercial uses, community facilities, or display cases;	**Consistent.** Although the site is not formally designated as a pedestrian-oriented district, the project would incorporate those characteristics typical of such districts and thus would improve the pedestrian environment in the area. Specifically, the project would introduce mid- and high-rise buildings with continuous walls that create a sense of enclosure along the street frontage; provide for retail store fronts and other community-serving uses at the ground level; provide sufficient lighting to create an attractive and safe environment; include structured parking within the interior of the site such that parking areas would generally not be visible from the street; and incorporate pedestrian links to connect and integrate all elements of the project. Bicycle

Table IV.A-1 (Continued)
Consistency of the Project with Applicable Provisions
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
d. Shops with entrances directly accessible from the sidewalk and located at frequent intervals; e. Well lit exteriors fronting on the sidewalk that provide safety and comfort commensurate with the intended nighttime use, when appropriate; f. Ground floor building walls devoted to display windows or display cases; g. Parking located behind the commercial frontage and screened from view and driveways located on side streets where feasible; h. Inclusion of bicycle parking areas and facilities to reduce the need for vehicular use; and i. The area within 15 feet of the sidewalk may be an arcade that is substantially open to the sidewalk to accommodate outdoor dining or other activities.	racks would be provided for public use, and outdoor seating would also be available in conjunction with the commercial uses.
Policy 5.8.2: The primary commercial streets within pedestrian-oriented districts and centers should have the following characteristics: a. Sidewalks: 15-17 feet wide (see illustrative street cross-sections). b. Mid-block medians (between intersections): landscaped where feasible. c. Shade trees, pruned above business signs, to provide a continuous canopy along the sidewalk and/or palm trees to provide visibility from a distance. d. Pedestrian amenities (e.g., benches, pedestrian-scale lighting, special paving, window boxes and planters).	**Consistent.** Although the project site is not located within a designated pedestrian-oriented district, the project would meet many of the listed criteria under this policy pertaining to sidewalks, shade trees, and pedestrian amenities. The streets surrounding the project site do not contain mid-block medians and therefore, this particular criterion would not apply.

Table IV.A-1 (Continued)
Consistency of the Project with Applicable Provisions
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Open Space and Conservation Chapter	
Policy 6.4.4: Consider open space as an integral ingredient of neighborhood character, especially in targeted growth areas, in order that open space resources contribute positively to the City's neighborhoods and urban centers as highly desirable places to live (see Chapter 5: Urban Form and Neighborhood Design).	**Consistent.** As previously discussed, the project would include landscaped courtyards, pathways and other open space features connecting the various uses in order to establish a pedestrian-oriented environment within the project vicinity. Specifically, the project would include two public courtyards, a pocket park, and a recreational area on the podium level for resident/guest use with a swimming pool, entertaining patios, and sunning areas, collectively totaling approximately 76,400 square feet of active and passive recreation and open space. Landscaping would also be provided along the perimeter of the site as well along pedestrian walkways throughout the site.

Note: Project consistency with additional General Plan Framework goals, objectives, and policies is analyzed in Section IV.F, Land Use, of this Draft EIR.

Source: Matrix Environmental, 2009.

the site is located, as the focal point of the Hollywood Community. Although, as discussed above, the project's size, scale and density would contrast with nearby residential development (particularly the Selma-La Baig Historic District) and result in a significant aesthetic impact, the land uses introduced by the project would be compatible with surrounding development, including adjacent residential areas, as discussed in Section IV.F, Land Use. Further, the project would include substantial open space areas throughout the site, thus supporting the Community Plan's goal of conserving open space. As such and based on the analysis provided below, the impact of the project relative to consistency with applicable policies in the General Plan Framework and Hollywood Community Plan would be less than significant. A detailed discussion of project consistency with additional General Plan Framework and Community Plan policies is provided in Table IV.F-1 and Table IV.F-2 within Section IV.F, Land Use, of this Draft EIR.

(ii) City of Los Angeles Walkability Checklist for Site Plan Review

Project consistency with the City's Walkability Checklist is provided in Table IV.A-2 on page IV.A-41. As shown, the project would comply with applicable design elements to foster a vibrant and visually appealing pedestrian environment. Specifically, the project would be designed to provide visual interest through variations in building height, bulk, massing, and design. The proposed buildings would be treated with contrasting but complementary colors, building plane variations, a variety of building materials, planters, and other landscape elements. Multiple surface reliefs and architectural extensions would also be incorporated into the buildings' façades, including parapets and varied rooflines. The project would also provide access points and a mix of landscaped public and private open space, including courtyards, to connect and integrate various elements of the site. Pedestrian pathways would be defined throughout the site to traverse the block and link some of the project elements within it. In summary, the project would incorporate the design elements specified within the Walkability Checklist for Site Plan Review, and associated project impacts would be less than significant.

(iii) Los Angeles Municipal Code

As discussed above, the project site is currently zoned [Q]C4-1VL-SN. As part of the project, the Applicant is requesting a Vesting Zone Change and Height District Change to C4-2-SN.[9] As the proposed Height District Change would allow unlimited building

[9] *In conjunction with this approval, the Applicant is also requesting a General Plan Amendment to permit the Regional Center Commercial land use designation in lieu of the existing Commercial Manufacturing designation and to permit a floor area ratio of 5.42:1 pursuant to Hollywood Community Plan's policies with regard to Section 506.2.3 of the Hollywood Redevelopment Plan. Please refer to Section IV.F, Land Use, for further discussion.*

Table IV.A-2
Consistency of Project with Design Elements of the
Walkability Checklist for Site Plan Review

Design Elements	Analysis of Project Consistency
Building Orientation	
The primary entrance for pedestrians should be at grade level from the public way and be easily accessible from transit stops, with as direct a path as possible to the transit stop. Retail establishments should maintain at least one entrance from the public way with doors unlocked during regular business hours.	**Consistent.** Ground level entrances would be provided for each of the existing and proposed buildings, with direct access to the street frontages and public courtyards proposed on-site. In order to foster a pedestrian environment, ground floor retail and restaurant uses would be provided within the existing one- and two-story buildings, the new 14-story office building, and within the proposed hotel, as well as on the podium level of the residential tower.
For residential entrances to individual units on all streets, and especially on commercial streets, a transition from the street/sidewalk to the front door should be created, such as grade separation, landscaping, and/or porches without negatively affecting the street wall.	**Consistent.** Private entrances to individual residential units on Selma Avenue and Gower Street would provide grade separation and landscaping that would not affect any street wall.
The main pedestrian entrance should be configured to be fully accessible per the ADA, such that an auxiliary approach for persons with mobility limitations (such as a ramp next to the main path to the primary entry) would not be necessary. For example, when the main finish elevation of the building is at an elevation above or below the finish elevation of the sidewalk, then the path into the building entry is a straight line perpendicular to a straight street (or radically to a curved street) that is accessible to persons with disabilities.	**Consistent.** The project would meet all Americans with Disabilities Act (ADA) requirements. In general, building entrances would be provided at grade level.
Especially on long blocks, passageways or paseos should be incorporated into mid-block developments which facilitate pedestrian movement through the depth of the block to the front of the next parallel block, such that pedestrians need not walk the circumference of a block in order to access the middle of the next parallel block or alley or parking behind the block.	**Consistent.** As previously described, the project would include multiple access points and a mix of landscaped public and private open space, including several courtyards, to connect and integrate all elements of the site. Pedestrian pathways would be defined throughout the site to traverse the block and link the various project elements within it. The ground level of nearly all of the buildings would include pedestrian links to the surrounding environs, as well as to the interior common recreation areas.

Table IV.A-2 (Continued)
Consistency of Project with Design Elements of the
Walkability Checklist for Site Plan Review

Design Elements	Analysis of Project Consistency
Where incorporated, mid-block passageways or paseos should be active, visually interesting spaces, and safe. Activities could include: building entrances; windows; seating; dining; water features; kiosks; vending or displays. Visually interesting features could include: colors; textures; architectural elements; public art; pedestrian-level lighting.	**Consistent.** Pedestrian pathways would be defined throughout the site to traverse the block and/or connect and integrate the various project elements within it, including landscaped courtyards, a pocket park, and some of the community-serving retail and restaurant uses on-site. Such areas would be intelligently designed to foster a pedestrian-friendly atmosphere.
Building Frontage	
The façade should include a variety of features such as: a combination of different textures, colors and materials; distinctive architectural features; display windows; signage; setbacks and differentiated massing; rooflines; shade and shadow textures.	**Consistent.** The proposed buildings would be treated with contrasting but complementary colors, building plane variations, a variety of building materials, planters, and other landscape elements. Multiple surface reliefs and architectural extensions would also be incorporated into the buildings' façades, including parapets and varied rooflines. Architectural materials would likely include varying spandrel glass, clay/terracotta rain screen tiles, stainless steel cable balcony railing, and architectural smooth finish concrete.
Upper floors should be differentiated from the ground floor.	**Consistent.** Building plane variations and the incorporation of multiple surface reliefs and architectural extensions in building façades would serve to differentiate the lower and upper levels of the proposed buildings. The ground floor level of some buildings may also feature recessed entrances with building overhangs and decorative columns to provide façade differentiation and facilitate pedestrian traffic flow. Refer to Figures IV.A-4 though IV.A-20 provided through this analysis for conceptual illustrations of the proposed structures.
There should be no blank walls. Walls should be interesting facades by incorporating a combination of elements such as: sculpted, carved or penetrated wall surface; planters; murals; mosaics; public art; awnings; lighting.	**Consistent.** As described, the proposed buildings would be treated with building plane variations, a variety of building materials, planters, and other landscape elements. Multiple surface reliefs and architectural extensions would also be incorporated into the buildings' façades, including parapets and varied rooflines. The existing buildings to remain would be rehabilitated with elements incorporated according to the Secretary of the Interior Standards for Rehabilitation.

Table IV.A-2 (Continued)
Consistency of Project with Design Elements of the
Walkability Checklist for Site Plan Review

Design Elements	Analysis of Project Consistency
The building frontage should include overhead architectural features, such as awnings, canopies, trellises or cornice treatments.	**Consistent.** The ground floor level of some buildings may feature recessed entrances with building overhangs and decorative columns to provide façade differentiation and facilitate pedestrian traffic flow. Refer to Figures IV.A-4 through IV.A-20 provided throughout this analysis for conceptual illustrations of the proposed structures.
Any spaces created by setbacks, building cut-offs and/or breaks in exterior walls should be turned into active spaces, such as active plazas or courtyards (activities could include: dining; seating; water features; kiosks; vending or displays). Where appropriate given the character of the street and a sidewalk that is narrower than desired, the setback should be increased to create more space for such active plazas or courtyards and/or additional pedestrian amenities or landscaping.	**Consistent.** As previously discussed, landscaped courtyards, pedestrian pathways, and a garden would be provided throughout the site. The ground floor level of some buildings may feature recessed entrances with building overhangs and decorative columns to provide façade differentiation and facilitate pedestrian traffic flow. In addition, outdoor seating would be provided in conjunction with commercial uses.
Where there are breaks or openings in the ground floor building façade, architectural features should be applied to create continuity across the break(s).	**Consistent.** As described throughout this analysis, the project would be designed to maximize visual interest and the pedestrian experience. Complementary architectural materials would be utilized throughout the project site to provide for continuity.
The building should be placed at the front property line or at the required setback; that is, the building should not be set back further than the required setback in order to be as close as possible to the front property line and maintain a strong street wall.	**Consistent.** Per LAMC requirements for C4-zoned properties, setbacks are not required for commercial buildings, and only that portion of a building used for residential purposes must have an R4 setback at the floor level of the first story. The project would comply with the setback requirements, and its street frontage would provide continuous, articulated building walls that create a sense of enclosure along the street, with recessed entrances in some locations.
On-Site Landscaping	
Canopy trees (in addition to street trees) should be provided in landscaped areas. For example, a row of trees could be provided on both sides of the sidewalk.	**Consistent.** Landscape plans for the ground and podium levels are provided in Figures II-9 and II-10 respectively, within Section II, Project Description. As shown, landscaping including ornamental trees would be provided along the perimeter of the site as well along pedestrian walkways integrated throughout the project site.

Table IV.A-2 (Continued)
Consistency of Project with Design Elements of the
Walkability Checklist for Site Plan Review

Design Elements	Analysis of Project Consistency
Landscaping should not impede pedestrian movement or views. For example, avoid tall shrubbery immediately adjacent to the sidewalk.	**Consistent.** Landscape plans for the ground and podium levels are provided in Figures II-9 and II-10, respectively, within Section II, Project Description. As shown, landscaping including ornamental trees would be provided along the perimeter of the site as well along pedestrian walkways integrated throughout the project site. Refer to the analysis below regarding views of the project.
Trees should be considered especially where such additional vertical elements reinforce or contribute to the street wall and a sense of enclosure.	**Consistent.** Landscape plans for the ground and podium levels are provided in Figures II-9 and II-10, respectively, within Section II, Project Description. As shown, landscaping including ornamental trees would be provided along the perimeter of the site as well along pedestrian walkways integrated throughout the project site.
Off-Street Parking and Driveways	
Parking should be located at the rear of the building rather than adjoining the adjacent major street.	**Consistent.** The proposed parking facility would be physically integrated within the interior of the project site and, with the exception of vehicular access points, would generally not be visible from the adjacent public rights-of-way.
Alleys should be used to access the parking behind the building. If no alley is available, access should be created from a side street.	**Consistent.** As the parking facility would be physically integrated within the interior of the project site and surrounded on all sides by building façades, pathways would be provided as necessary to provide sufficient pedestrian access to the parking areas.
Vehicle access into and from the site should be accommodated with as few driveways as possible to the street; and, where available, the site plan should encourage and accommodate as much vehicle access as possible from side streets and/or alleys.	**Consistent.** Vehicular access to the parking facility would be provided via El Centro Avenue, Selma Avenue, and Gower Street. Entry points would be provided, as necessary, to provide sufficient access to the various uses on-site (e.g., the hotel lobby entrance) as well as the parking facility.
The width of each driveway should meet and not exceed the standard width identified as necessary to accommodate vehicles.	**Consistent.** The proposed driveways would meet all applicable design and engineering standards set forth by the City.
There should be no parking within the front setback of the building, except in an allowed driveway. Techniques and features, such as heavy landscaping or garden walls, should be used to help mitigate the impact of any parking in the front setback.	**Consistent.** Parking would not be permitted within building setbacks, other than temporary parking within an entry cul-de-sac near the entrance of the hotel. As shown within Figure II-9 in Section II, Project Description, landscaping would be provided within this area.

Table IV.A-2 (Continued)
Consistency of Project with Design Elements of the
Walkability Checklist for Site Plan Review

Design Elements	Analysis of Project Consistency
Easily identifiable pedestrian walkways should be provided from the parking to the sidewalk and to the entrance of the building. Techniques, such as landscaped lightwells and surface treatments, could be used.	**Consistent.** As previously described, pedestrian pathways would be defined throughout the site to traverse the block and connect the various project elements, including the parking facility. Such pathways would be landscaped and lit, as appropriate.
All parking areas and integrated pedestrian walkways should be illuminated with adequate, uniform and glare-free lighting such that there is even light distribution and there are no harsh shadows.	**Consistent.** As the proposed parking facility would be physically integrated within the interior of the project site and would not be visible from off-site (with the exception of driveways), off-site glare and light spillover would not occur. Pedestrian pathways would be sufficiently lit to create an attractive and safe environment, while minimizing glare and spillover effects, as discussed further in the analysis below.
Driveways that have been or are to be abandoned should be reconstructed as sidewalks.	**Consistent.** The existing driveways on-site would be removed and new driveways designed to access the project, as appropriate.
Building Signage and Lighting	
The building façade should include pedestrian-scale signage, i.e., at a height and of a size that is visible to pedestrians, assists in identifying the structure and use, and facilitates access to the entrance.	**Consistent.** In addition to the proposed media boards, proposed signage would include ground level and wayfinding pedestrian signage, as permitted within the HSSUD. The project would introduce well-designed, appropriately-scaled signage to contribute to the character and architecture of the existing and proposed buildings on-site. Project signage would be architecturally integrated into the design of the buildings and would be intended to bring visual dynamism to the area, consistent with the mixed-use, pedestrian-oriented nature of the site.
Pedestrian-level lighting should be provided on building facades and around the site along pedestrian pathways.	**Consistent.** Lighting would be utilized as necessary to promote pedestrian safety and wayfinding.

Source: Matrix Environmental, 2009.

heights and a maximum FAR of 6:1, the project would be consistent with these development standards. Furthermore, setbacks and lot areas for the project's residential buildings would be established in accordance with LAMC Section 12.14. Thus, with the proposed Zone and Height District Change, the project would be consistent with the development standards set forth in the LAMC. Further discussion is provided in Section IV.F, Land Use. Project consistency relative to the supplemental signage (SN) district regulations and lighting standards is analyzed below.

(iv) Hollywood Signage Supplemental Use District and Design for Development for Signs in Hollywood

As previously described, the project includes a signage program that would support the purpose and intent of the Hollywood Signage Supplemental Use District and the Design for Development for Signs in Hollywood and would comply with applicable signage requirements, including those set forth in the LAMC and the Hollywood Redevelopment Plan. The general ground level and wayfinding pedestrian signage proposed as part of the project would be consistent with the allowed signage types and associated provisions within the HSSUD and DFD. Similarly, the project's signage program, including the seven existing backlit wall signs attached to the Columbia Square Complex buildings, and the conceptual artistic wall element contemplated for the hotel would comply with all applicable signage requirements and seek appropriate approvals, if necessary. In addition, the existing pole sign located on-site, while considered a legally non-conforming sign, would be removed as part of the project. Further, the total area of project signage would not exceed the total permitted signage area of four square feet per foot of street frontage. In accordance with the HSSUD and DFD, project signage would not detract from the character-defining features of the historic buildings on-site. New signage would not cover or alter such features, would not interfere with street views of such features, and would blend with the International style architecture of the existing buildings. To this end, in accordance with HSSUD and DFD requirements, the Applicant would submit documentation prepared by a qualified architectural historian to demonstrate that any new or replacement signage proposed on a façade of any of the historic buildings on-site would not "obscure or alter any character-defining features, views of character-defining features, historic signs, or views of historic signs on the building where the sign is [to be] located or any adjacent historic buildings, and that the sign blends with the architecture of the building."[10] Project signage also would not interfere with views of the Hollywood Sign and the Hollywood Hills to the north.

[10] *City of Los Angeles Ordinance No. 176172 (Hollywood Signage Supplemental Use District), Section 6.E.2.*

In summary, the proposed signage would be aesthetically compatible and consistent with existing signage in the area and the architecture of the site. Based on the above, the project would be consistent with the HSSUD and DFD, and impacts would be less than significant.

(v) Community Redevelopment Agency Hollywood Redevelopment Plan

As shown in Table IV.A-3 on page IV.A-48, the project would be consistent with applicable goals and standards within the Hollywood Redevelopment Plan. Specifically, the project would support the Redevelopment Plan goal to promote a positive image for Hollywood by introducing a synergistic mix of uses housed within new development featuring contemporary architecture, modern amenities, and a relandscaped public realm. The project would also retain and rehabilitate all but one historic structure on-site and allow for the adaptive reuse of such buildings, thus acknowledging the history of the site while building on it for the future. Additionally, the project would implement sensitive parking structure design and meet applicable signage regulations. Further, the project would include open space areas and recreational amenities throughout the site. As such, based on the analysis provided below, the impact of the project relative to consistency with applicable policies in the Hollywood Redevelopment Plan would be less than significant. A discussion of project consistency with additional Redevelopment Plan goals and standards is provided in Table IV.F-2 within Section IV.F, Land Use, of this Draft EIR.

(2) Views

The construction of new buildings and structures within the line of sight of a scenic resource has the potential to create an adverse impact with respect to view blockage. Public viewing locations or vantage points with respect to the project site include: (1) public streets and sidewalks adjacent to the site and in the surrounding area that have existing views of identified valued view resources; (2) distant view locations such as public vantage points within the Hollywood Hills; and (3) other public areas offering views of Hollywood that traverse the project site.

Private viewing locations within the project vicinity include nearby residential and commercial properties, including the Selma-La Baig Historic District to the immediate east and northeast, residences throughout the Hollywood Hills to the more distant north, and adjacent office, retail and entertainment uses at surrounding properties (e.g., Gower Gulch, Sunset Gower Studios, the Hollywood Palladium event venue, etc.). However, the significance thresholds cited in the *City of L.A. CEQA Thresholds Guide (2006)* do not provide regulatory protection to individual private views from residential or commercial properties. Nonetheless, view impacts affecting such properties are analyzed herein.

Table IV.A-3
Consistency of Project with Applicable Sections
of the CRA Hollywood Redevelopment Plan

Goal/Standard	Analysis of Project Consistency
Section 300. Redevelopment Plan Goals	
5) Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as: a) adopting land use standards; b) promoting architectural and urban design standards including: standards for height, building setback, continuity of street façade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances; c) promoting landscape criteria and planting programs to ensure additional green space; d) encouraging maintenance of the built environment; e) promoting sign and billboard standards; f) coordinating the provision of high quality public improvements; g) promoting rehabilitation and restoration guidelines; h) integrate public safety concerns into planning efforts.	**Consistent.** The project would provide a mixed-use site with varied residential, business, and community-serving commercial uses. The project would be designed to provide visual interest through variations in building height, bulk, massing, and design, as well as through unique signage. The site layout and architectural style of the new structures, featuring clean lines and a contemporary urban architecture, are intended to complement the Columbia Square Complex buildings that will remain on-site. The project design also reflects a transition in building height with regard to the existing historic structures and the surrounding neighborhood's character. In addition, rooftop screening features would be used to obscure rooftop equipment from view. As previously discussed, the project would include open space such as landscaped pedestrian walkways, courtyards, and a pocket park to improve the visual character of the site. As well, rehabilitation of the Columbia Square Complex buildings would conform to the Secretary of the Interior Standards. Further, proposed signage would comply with applicable standards, as discussed above.
11) Recognize, promote and support the retention, restoration and appropriate reuse of existing buildings, groupings of buildings and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria.	**Generally Consistent.** Rehabilitation of the Columbia Square Complex buildings, which are considered historic resources under CEQA, would conform to the Secretary of the Interior Standards. The functionality of the rehabilitated structures would be fully integrated with that of the other structures proposed on-site, and extensive landscaping, open space, and pedestrian links would be introduced to connect and integrate all elements of the project. The removal of Studio B/C, however, would be considered a significant impact, as discussed in Section IV.C, Historic Resources. In addition, the size and scale of certain project elements would significantly alter historic spatial relationships on-site.

Table IV.A-3 (Continued)
Consistency of Project with Applicable Sections
of the CRA Hollywood Redevelopment Plan

Goal/Standard	Analysis of Project Consistency
14) Promote and encourage development of recreational and cultural facilities and open spaces necessary to support attractive residential neighborhoods and commercial centers.	**Consistent.** The project would provide a open space, landscaping and amenities. Publicly accessible landscaped open space would consist of two public courtyards and a pocket park. As part of the project, the existing Sunset Courtyard fronting Sunset Boulevard would be renovated, re-landscaped, and reintroduced as a new pedestrian-oriented amenity for the greater community, connecting to other green spaces on-site and creating a walkable district. Additional amenities for residents and guests would include recreation rooms, courtyards on the podium level, swimming pools, entertaining patios, and sunning areas. Overall, the project would provide approximately 59,000 square feet of common open space and approximately 17,400 square feet of private open space.
516. Signs and Billboards All signs must conform to City sign and billboard standards as they now exist or are hereafter legislated. It is recognized that the coordination of signs and billboards within the project area affect its appearance and image. Therefore, it is the intent of this Plan that the Agency may, after public hearing, adopt additional sign and billboard standards for a portion of or the entire Project Area which may be more restrictive than City standards in order to further the goals of this Plan or the objectives of a special district as established by this Plan.	**Consistent.** As discussed above, the project includes a signage program designed in compliance with applicable signage requirements, including those set forth in the Hollywood Redevelopment Plan. The project would introduce illuminated, appropriately-scaled signage to contribute to the character and architecture of the existing and proposed buildings on-site. Project signage would be architecturally integrated into the design of the buildings and would be intended to bring visual dynamism to the area, consistent with the mixed-use nature of the site and surrounding area and in keeping with CRA's adopted Design for Development signage standards for Hollywood.
518.2 Parking and Loading Parking spaces, parking facilities and loading areas shall be designed to promote public safety and to prevent an unsightly or barren appearance. Lighting shall be provided to promote public safety. Lighting for parking spaces shall be shielded from adjacent residential properties and adjoining residential streets.	**Consistent.** Proposed parking would be designed in accordance with applicable Code requirements, and as described above, would be located within the interior of the site, generally hidden from public view. Lighting would be utilized as necessary to promote pedestrian and automobile safety and wayfinding. Given the design of the parking structure, parking lot lighting would not be visible from off-site.

Table IV.A-3 (Continued)

Consistency of Project with Applicable Sections of the CRA Hollywood Redevelopment Plan

Goal/Standard	Analysis of Project Consistency
519. Setbacks Parking for new developments shall not be permitted in the required residential front yards. Setback areas not used for access, or, when permitted parking, shall be landscaped and maintained by the owner unless otherwise specified in a Participation or Development Agreement. The Agency may adopt Design(s) for Development which establish setback and landscape requirements for new developments within the Project Area.	**Consistent.** Proposed parking would be located within the interior of the site, surrounded on all sides by building façades, and as such would not be located within any setback areas. Any building setbacks along street frontages not utilized for pedestrian access would be landscaped in conjunction with a landscaping plan designed to promote a visually pleasing pedestrian environment.

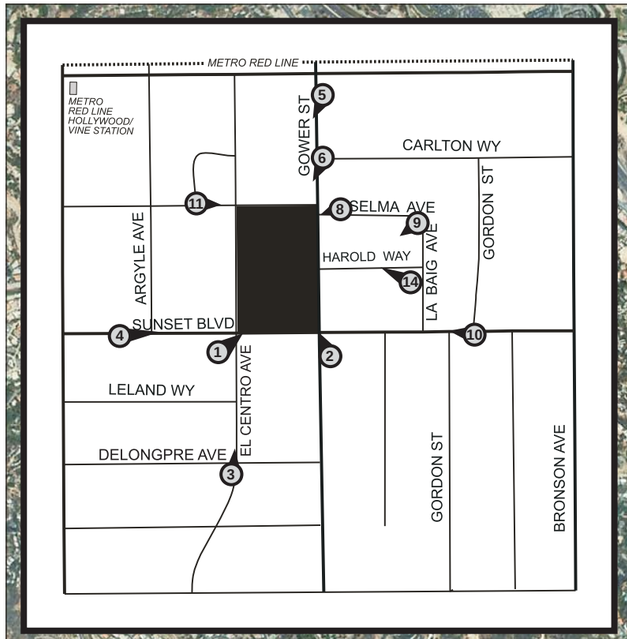
Note: Project consistency with additional Hollywood Redevelopment Plan goals is analyzed in Section IV.F, Land Use, of this Draft EIR.

Source: Matrix Environmental, 2009.

As described above, within the project area Sunset and Hollywood Boulevards are designated as Scenic Highways. View resources within the project area that are available from public vantages include: (1) the existing on-site Columbia Square Complex buildings within the project site, which are considered historic resources; (2) the Hollywood Sign, a City-designated historic monument, and the Hollywood Hills located to the north, which provide an important scenic backdrop to large portions of the metropolitan Los Angeles area; (3) the Hollywood Boulevard Commercial and Entertainment District, which includes numerous historic structures and provides views of the urban streetscape (and which, in general, are not visible from the project site); (4) historic structures along Sunset Boulevard, such as the nearby Cinerama Dome, Hollywood Palladium event venue, and the Columbia Square Complex; and (5) the Selma-La Baig Historic District. Refer to Figure IV.A-10 on page IV.A-52 for a key to the view location photos presented below.

(a) North-Facing Views

Simulated views of and across the project site from vantage points to the south and southwest are provided in Figures IV.A-11, IV.A-12, IV.A-13, IV.A-14, and IV.A-15 on pages IV.A-53 through IV.A-57, respectively. Long-range northerly views in the area, while intermittent, may well be considered some of the most valued views available given the visibility of the scenic Hollywood Hills and Hollywood Sign that help define the visual character of the Hollywood Community. As shown in the simulations, the project—the residential tower and 14-story office building in particular—would be highly visible from many locations to the south and southeast. As seen in Figures IV.A-11 and IV.A-13, taken along El Centro Avenue and Gower Street, respectively, at Sunset Boulevard, project structures would partially obstruct views of the Hollywood Hills and the Hollywood Sign. However, such views are currently available on an intermittent basis along certain portions of local roadways, and such views would continue to be available on an intermittent basis along roadway segments throughout the project area, including El Centro Avenue and Gower Street. For example, Figure IV.A-12 also presents a view from El Centro Avenue and Sunset Boulevard (taken at the southwest corner, as opposed to just south of the intersection, as shown in Figure IV.A-11), and demonstrates that views of the Hollywood Sign from that vantage point would be maintained. Impacts along the length of Sunset Boulevard, a designated scenic highway, would be similar, with intermittent obstruction of the Hollywood Hills and the Hollywood Sign from certain vantages. However, as shown in Figure IV.A-11, the project would not eliminate northerly views of the view resources in the area. It is further noted that views of the remaining Columbia Square Complex buildings, which are considered historic resources, would be maintained, including along Sunset Boulevard. Moreover, the project would align the proposed buildings in a way that permits a variety of long range views for building occupants, including views of the Hollywood Hills, the Hollywood Sign, and various contributing historic resources within the Hollywood



Columbia Square

matrix environmental

0 0.5 1 Mile

Figure IV.A-10
View Location Map

Source: Matrix Environmental, 2009; Google Earth, 2008.

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

Figure IV.A-11
Simulated Project View A from
Sunset Boulevard and El Centro Avenue
(Key Map No. 1)

matrix environmental

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

Figure IV.A-12
Simulated Project View B from
Sunset Boulevard and El Centro Avenue
(Key Map No. 1)

matrix environmental

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

matrix environmental

Figure IV.A-13
Simulated Project View from
Sunset Boulevard and Gower Street
(Key Map No. 2)

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

Figure IV.A-14
Simulated Project View from
El Centro Avenue and De Longpre Avenue
(Key Map No. 3)

matrix environmental

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

Figure IV.A-15
Simulated Project View from
Sunset Boulevard West of Argyle Avenue
(Key Map No. 4)

matrix environmental

Source: LJG Partners, 2007

Boulevard Commercial and Entertainment Historic District. It is noted that while the photo simulations represent views from public locations along local roadways, similar views and view impacts would occur from nearby private vantage points.

As shown in Figure IV.A-14, vantages from further south of the site will also have views of the Hollywood Hills ridgeline obstructed by project development. Though total obstruction may be experienced from specific locations, such as that shown, other nearby vantages would experience partial obstruction or no obstruction (for example, from the centerline of El Centro Avenue looking north). Further, as shown in Figure IV.A-14, the ridgeline does not feature prominently into northerly views from some vantages due to existing intervening structures and vegetation. Thus, the project would not dramatically alter the overall view experience throughout the area. Similarly, as shown in the northeasterly view in Figure IV.A-15, existing views of the distant ridgeline are minimal, with Griffith Park Observatory barely detectible in the background. The project would obstruct such views from certain vantages, as shown, but views would continue to be available on an intermittent basis, as is the case under current conditions. Thus overall, view impacts along Sunset Boulevard would be limited to certain vantage points and would not affect long segments of the scenic highway. Further, it is noted that the Hollywood Hills rise to an elevation of approximately 1,100 feet with the Hollywood Sign located near the ridgeline, well above the maximum heights of the proposed buildings, as shown in Figures IV.A-8 and IV.A-9. Thus, throughout the area south of the hills, intermittent views of these visual resources will continue to be available. Therefore, the project would not substantially obstruct existing views of visually prominent resources, and impacts would be less than significant.

(b) South-Facing Views

Simulated views of and across the project site from vantage points to the north, northwest, and northeast are provided in Figures IV.A-16, IV.A-17, IV.A-18, IV.A-19, IV.A-20, and IV.A-21 on pages IV.A-59 throughIV.A-64, respectively. As shown, project implementation would alter views of the skyline, and the new structures would be visible from nearby and elevated view points. In Figure IV.A-16, taken from Gower Street at Hollywood Boulevard (a scenic highway), and Figure IV.A-17, taken from a closer vantage along Gower Street, views of valued visual resources are not generally available under existing conditions, and thus, none would be obstructed by the project. The current sense of openness within the project site (i.e., the open sky above the site) would be reduced, but would not be eliminated entirely and would continue to exist elsewhere throughout the area wherever mid-range views of low-profile development exist. In general, while views of project development would be available from Hollywood Boulevard, valued views from this scenic highway would not be substantially affected (except as described above). Additionally, the existing view corridor along Gower Street would remain.

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

matrix environmental

Figure IV.A-16
Simulated Project View from
Hollywood Boulevard and Gower Street
(Key Map No. 5)

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

matrix environmental

Figure IV.A-17
Simulated Project View from
Gower Street and Carlton Way
(Key Map No. 6)

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

matrix environmental

Figure IV.A-18
Simulated Project View from
Top of Argyle Avenue
(Key Map No. 12)

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

Figure IV.A-19
Simulated Project View from
the Hollywood Hills
(Key Map No. 7)

matrix environmental

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

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Figure IV.A-20
Simulated Project View from
the Hollywood Hills
(Key Map No. 15)

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

Figure IV.A-21
Simulated Project View from
the Hollywood Hills
(Key Map No. 13)

matrix environmental

Source: LJG Partners, 2007

As shown in Figure IV.A-18, as distance increases from the project site, proposed development would feature less dominantly within southerly views. Taken from the top of Argyle Avenue heading up into the Hollywood Hills (approximately 0.7 mile north-northwest of the site), the photo simulation illustrates that while the upper stories of the new towers would be clearly visible, intervening structures and landscaping would partially obscure views of the project.

Figure IV.A-19 shows a panoramic view of the project site and surrounding cityscape from the Hollywood Hills at North Sycamore Avenue, located approximately 2.4 miles northwest of the project. As shown, views from this vantage point would experience minor interruption of the distant horizon due to the project; however, the horizon line is presently interrupted by existing mid- and high-rise buildings in the area, as well as the downtown Los Angeles skyline in the distance, and thus the project would not represent a substantial change from existing conditions. Further, this simulation clearly illustrates the highly urbanized nature of the area between the Hollywood Hills and downtown. The project would continue to appear as part of the fabric of urban development and would not block or otherwise degrade a valued scenic vista. While the proposed residential building would be clearly discernable given its height, the project as a whole would alter views little if any in the context of the greater urban landscape. As previously mentioned, long-range views from the Hollywood Hills are generally not sensitive to individual development projects, like the project, since such projects are subordinate to broader views of the urban landscape.

Similarly, Figures IV.A-20 and IV.A-21 show panoramic views from northeast of the project site, taken at Griffith Observatory (located nearly 1.8 miles to the northeast) and North Beachwood Drive (approximately 2.1 miles to the north-northeast), respectively, both at elevations of over 1,000 feet above sea level. From these vantage points, the project towers would blend in with the surrounding urban environment. Due to their height and mass, the new structures would be clearly discernable, but would not substantially alter views in the context of the greater urban landscape. Due to the distance and change in elevation, the project would not block or otherwise degrade a valued scenic vista from such vantages.

Similar effects would be expected from vantage points throughout the Hollywood Hills, including from other public roadways as well as private residential properties; it is noted, however, that due to heavy vegetation and landscaping, many hillside vantages have limited views, if any, of the project area and surrounding skyline. Since the project would not substantially obstruct views of visually prominent resources from vantages to the north, impacts would be less than significant.

(c) West-Facing Views

Figures IV.A-22, IV.A-23, IV.A-24, and IV.A-25 on pages IV.A-67 through IV.A-70, respectively, illustrate west-facing views of the project site, as experienced from various vantage points to the east. Similar to other nearby views of the site, project development would be visually evident but would not obstruct views of valued visual resources from most vantage points. As shown in Figures IV.A-22 through IV.A-23, taken from within the Selma-La Baig Historic District, project development would merely block views of other, more distant buildings to the west of the site. As seen in Figure IV.A-22, the existing sense of openness above the site would be reduced, altering the view experience from nearby vantages on streets such as Selma Way; however, valued views would not be obstructed, and views of the sky would continue to be available throughout the area. Furthermore, the juxtaposition of higher density development near existing low-rise structures pertains more to aesthetics rather than views; refer to the discussion of aesthetic impacts as it relates to the Selma-La Baig Historic District, above. As shown in Figure IV.A-23, as distance increases from the project site along Selma Avenue, intervening trees obscure much of the view of proposed development, and the project has less of an effect on existing views. As shown in Figure IV.A-24, however, taken at Harold Way and La Baig Avenue, project structures would appear visually prominent at the end of the street due to their proximity. As with the other nearby vantages within the Selma-La Baig Historic District, the sense of openness above the site would be reduced and the view experience would be altered. To the extent that project development would obstruct west-facing views of the existing on-site buildings, existing views of a valued visual resource would be altered as a result of project development. The loss of these views would be considered a significant impact. Valued west-facing views of other visual resources (e.g., natural topography, natural settings, other manmade or natural features of visual interest, and resources such as mountains or the ocean) would not be significantly affected.

Figure IV.A-25 shows the west-facing views of the project site and environs, as seen from Sunset Boulevard. As illustrated, views of the Columbia Square Complex buildings and other nearby historic structures along Sunset Boulevard would continue to be available. Views of other valued visual resources in the area are not available from this vantage under existing conditions, and thus, none would be obstructed by the project. Though altered by project development, views of the open sky would continue to exist both above the site and throughout the area. In addition, the existing view corridor along Sunset Boulevard would remain. In summary, the project would not substantially obstruct views of visually prominent resources from vantages to the east, and impacts would be less than significant.

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

matrix environmental

Figure IV.A-22
Simulated Project View from
Selma Avenue and Gower Street
(Key Map No. 8)

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

Figure IV.A-23
Simulated Project View from
Selma Avenue and La Baig Avenue
(Key Map No. 9)

matrix environmental

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

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Figure IV.A-24
Simulated Project View from
Harold Way and La Baig Avenue
(Key Map No. 14)

Source: LJG Partners, 2007

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

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Figure IV.A-25
Simulated Project View from
Sunset Boulevard and Gordon Street
(Key Map No. 10)

Source: LJG Partners, 2007

(d) East-Facing Views

A simulated view of the project site from the west is shown in Figure IV.A-26 on page IV.A-72, taken from Selma Avenue between Vista del Mar and Argyle Avenue. As with other vantages in the surrounding area, other than views of various historic structures along Sunset Boulevard, which would not be affected by the project, views of valued visual resources are not available from the west under existing conditions, and thus, none would be obstructed by the project. In particular, clear views of the Selma-La Baig Historic District are not available from vantages west of the project site due to the low-rise nature of the residential properties comprising the district and intervening development and trees. As project development would not obstruct an existing view of a visually prominent resource, east-facing view impacts would be less than significant.

(3) Light/Glare

(a) Light Impacts

Construction

Lighting needed during project construction could generate light spillover to adjacent uses in the project vicinity, including the residential uses to the east across Gower Street. However, construction activities would occur primarily during daylight hours and any construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements, and would only occur for the duration needed in the finite construction process. Thus, with adherence to existing LAMC regulations, light resulting from construction activities would not significantly impact residential uses, substantially alter the character of off-site areas surrounding the construction area, or interfere with the performance of an off-site activity. Therefore, light impacts associated with construction would be less than significant.

Operation

The project would introduce new lighting on the site and, thus, would increase ambient light levels on the project site and immediate vicinity. Exterior light sources would consist of low level lighting for security, wayfinding, architectural, and landscaping purposes. In addition, klieg lights associated with future studio uses on the site could possibly be used on occasion. As described above, lighting would be directed onto the areas to be lit (e.g., building details, landscape elements, signs, and pedestrian areas) and shielded to minimize light spillover effects. Any streetlights installed along the street frontages would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on

Existing View

View with Proposed Project

Note: This simulation is for conceptual purposes; actual building designs and materials may vary.

Columbia Square

matrix environmental

Figure IV.A-26
Simulated Project View from
Selma Avenue near Vista del Mar Street
(Key Map No. 11)

Source: LJG Partners, 2007

adjacent properties. In accordance with the Hollywood Redevelopment Plan, a lighting plan would be submitted to the Community Redevelopment Agency to ensure that project lighting would be directed and/or shielded to minimize spillage onto other properties. Project lighting would also meet all applicable LAMC lighting standards.

Interior light spillage from windows of the proposed uses would also contribute to an increase in ambient nighttime lighting levels, but such an increase would not be substantial as the project area is already characterized by medium-high nighttime lighting levels primarily due to the existing restaurant, retail, and entertainment uses throughout the Hollywood area. Overall, the project's low level lighting would not significantly increase nighttime lighting levels in the area. Therefore, the increase in ambient light would not alter the character of the area and would not interfere with nearby residential uses. Project impacts related to light would be less than significant. Furthermore, Mitigation Measures A-6 through A-8, listed below, are proposed to further ensure that specific design features would be implemented and that lighting impacts would remain less than significant.

(b) Glare Impacts

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic curtain walls and trim. Sun reflection can also occur with reflected light from parked vehicles. In general, sun reflection that has the greatest potential to interfere with driving occurs from the lower stories of a structure. Sun reflection from the project would occur during periods in which the sun is low on the horizon and when the point of reflection within the project is in front of the driver, in the direction of travel.

As described above, architectural materials would likely include materials such as glass, clay/terracotta, stainless steel, and concrete. While clay/terracotta and concrete are non-reflective, the use of glass and stainless steel or other polished surfaces could have the potential to produce glare. During late afternoons in the winter months, the project would be visible from major eastbound roadways, such as Sunset Boulevard, concurrent with the sun lowering in the southwestern horizon. This configuration has the potential to cause glare from any shiny façade materials or windows on the proposed residential tower's western façade. Reflective glare would not be expected during winter morning hours or during the other seasons of the year along Sunset Boulevard or other streets approaching the project site due to the respective positions of the sun. While acute glare conditions that hazardously interfere with driving are rare, they do occur and have the potential to exist on the western façade of the residential tower. This impact is considered potentially significant; however, implementation of Mitigation Measure Nos. A-9 and A-10 would reduce impacts to levels that are less than significant. In addition, glare reflected from parked vehicles on-site would not occur since vehicles would be parked within the enclosed structured parking facility.

(4) Shading

As discussed above, project structures would include a 40-story residential tower, located in the northwest corner of the site, which would reach a building height of approximately 447 feet (512 feet with other elements such as a helipad and architectural features), and a 14-story office building near the southeast corner of the site along Gower Street, with a building height of approximately 204 feet (260 feet with other elements such as the helipad and rooftop equipment). Development of the project would generate new shadows with varied lengths and angles depending on the time of day and season. A significant shade/shadow impact would occur if a project would shade off-site shadow-sensitive uses for more than three hours between 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March) or for more than four hours between 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).[11]

(a) Winter Solstice

Shadow impacts are typically greatest during the winter months due to the sun's low position in the sky, with the resultant longer shadows stretching roughly from the northwest to the northeast during daytime hours. As shown in Figure IV.A-27 on page IV.A-75, project shadows during the winter would extend in a northerly direction and would move from northwest to northeast across the surrounding landscape. Throughout most of the day, these shadows would only affect commercial uses that are not considered shadow-sensitive. However, in the afternoon hours, both the proposed residential tower and the Gower Street office building would cast shadows that extend to the residential uses to the northeast and east across Gower Street. As shown, between noon and 1:00 P.M. (approximately 12:30 P.M.), project shadows would cross into the residential neighborhood, first affecting the buildings located on the east side of Gower Street, and then extending further east into the neighborhood throughout the remainder of the afternoon. Shadows are thus predicted to affect nearby residential uses for a maximum of 2 hours and 30 minutes. Since shadow impacts occurring during Pacific Standard Time are only considered significant if lasting for more than three hours, winter shadows generated by the project would be less than significant.

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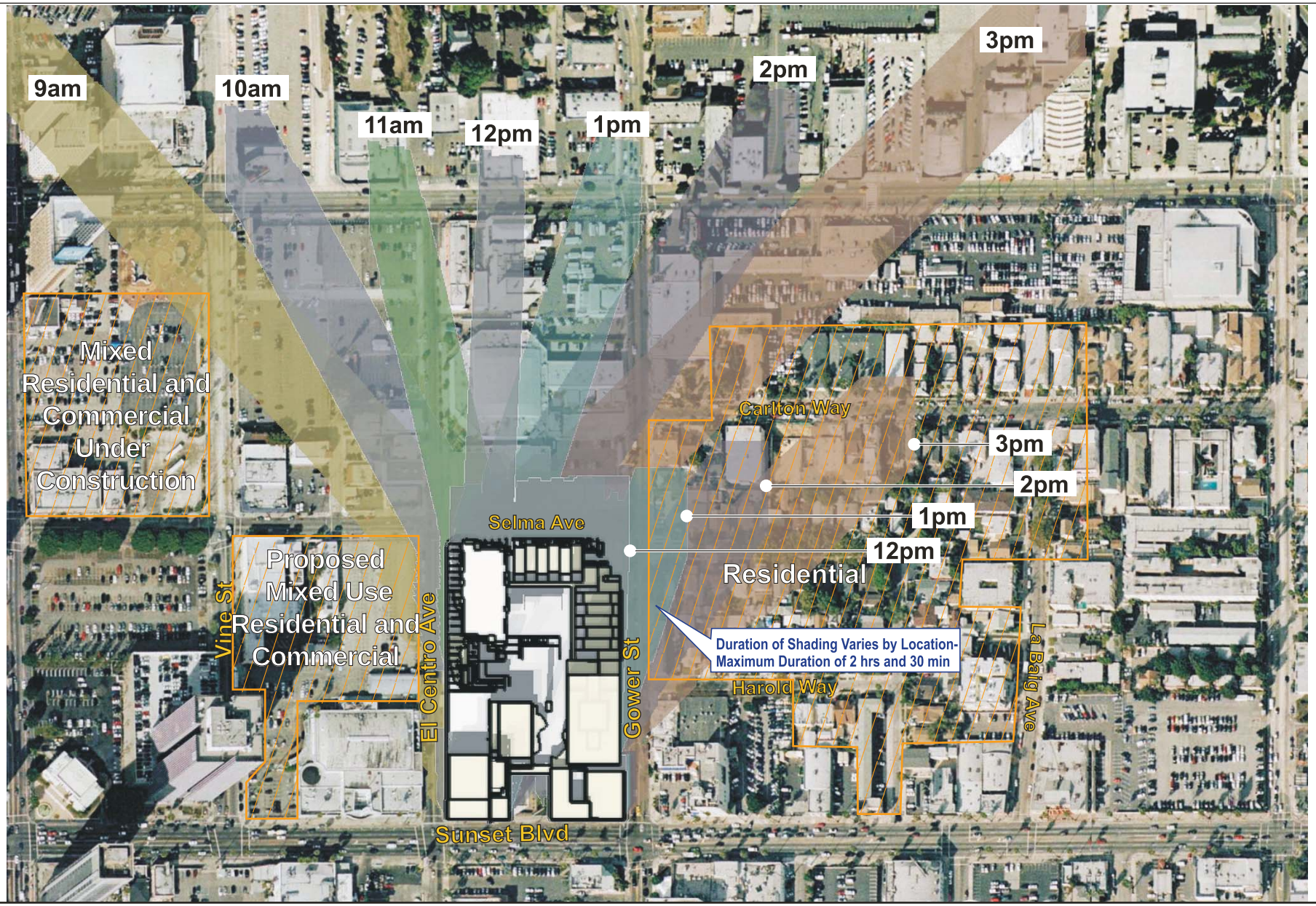
[11] *Timeframes have been adjusted from those specified in the City of L.A. CEQA Thresholds Guide (2006) to account for the new Daylight Savings time period (second Sunday in March through the first Sunday in November), which went into effect in 2007 (per the Energy Policy Act of 2005) to reduce energy consumption. Prior to this change, the spring equinox occurred within Daylight Standard Time and was therefore subject to shading analysis between the hours of 9:00 A.M. and 3:00 P.M.*



Columbia Square

matrix environmental

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Figure IV.A-27
Winter Solstice Shadows

Source: Matrix Environmental, 2009; Google Earth, 2007

(b) Spring Equinox

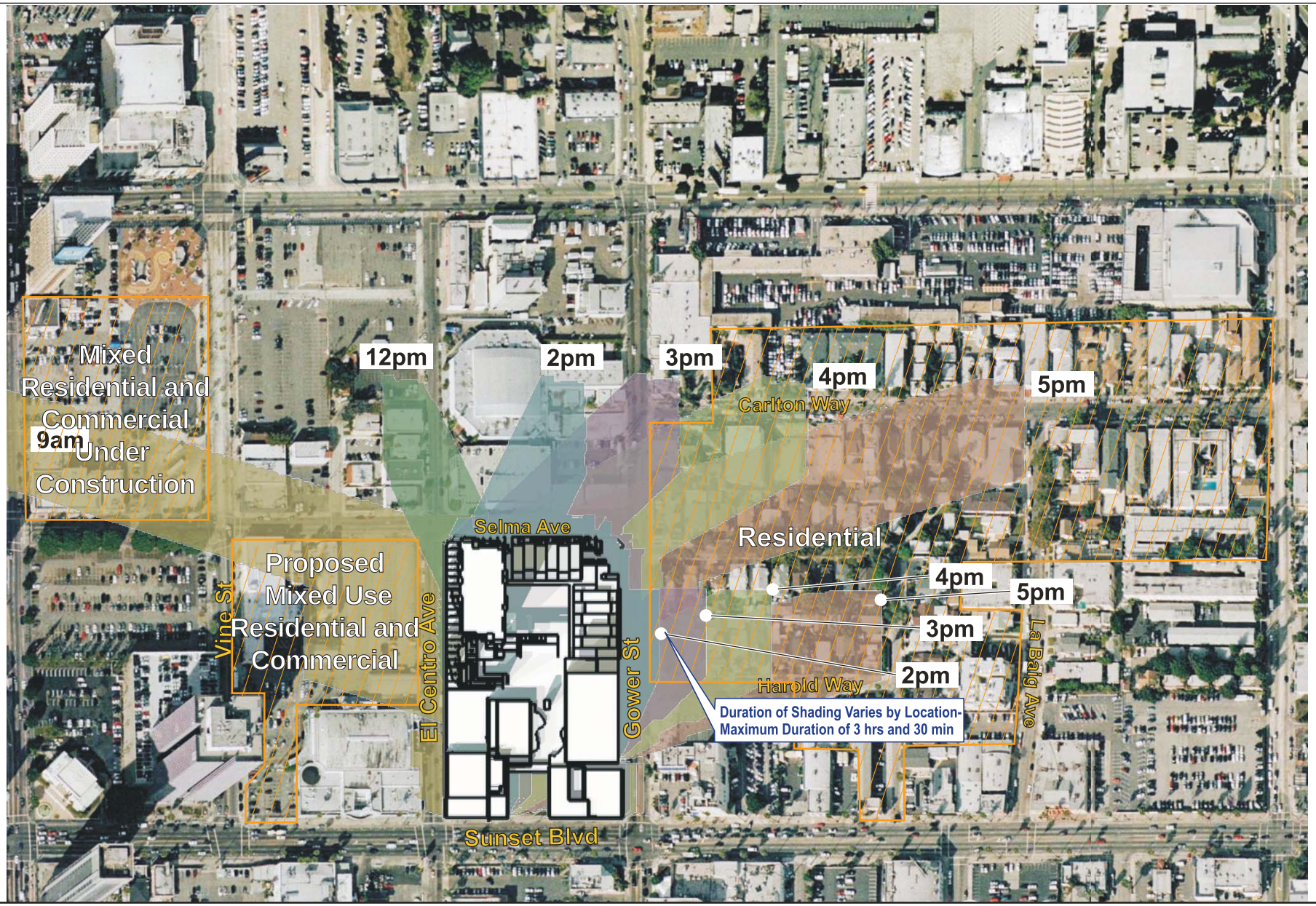
Figure IV.A-28 on page IV.A-77 shows project shadows during the spring equinox. Due to the sun's higher position in the sky, cast shadows are considerably shorter. As in the winter, project shadows would only affect non-sensitive commercial uses throughout most of the day. At approximately 1:30 P.M., shading from the project buildings would extend to the front of the buildings located on the east side of Gower and would continue eastward into the neighborhood during the subsequent afternoon hours. The maximum duration of shading between 9:00 A.M. and 5:00 P.M. would be three hours 30 minutes. Therefore, the project would not shade sensitive uses for more than four hours, and impacts would be less than significant.

(c) Summer Solstice

During the summer solstice, project shadows would be the shortest and would move from west to east. However, since City guidance regarding summer shadows requires an impact analysis until 5:00 P.M., afternoon shadows cast onto the residential uses to the east would last for a longer duration of time. As shown in Figure IV.A-29 on page IV.A-78, at approximately 2:00 P.M., project shadows would begin to affect the buildings on the east side of Gower Street and would continue eastward into the neighborhood during the rest of the afternoon. The maximum duration of shading between 9:00 A.M. and 5:00 P.M. would be approximately 3 hours. Since shadow impacts occurring from early March to early November are considered significant if lasting more than four hours, summer shadows generated by the project would be less than significant.

(d) Fall Equinox

As shown in Figure IV.A-30 on page IV.A-79, morning shadows during the fall equinox would affect only commercial uses to the northwest and north. However, between 1:00 P.M. and 2:00 P.M. (approximately 1:30 P.M.), project shadows would reach the east side of Gower Street and affect existing shadow-sensitive residential uses. These afternoon shadows would continue to extend eastward into the residential neighborhood throughout the remainder of the day. The maximum duration of shading would be 3 hours and 30 minutes and would be experienced only by those residential structures closest to Gower Street. Since shadow impacts occurring between 9:00 A.M. and 5:00 P.M. are considered significant if lasting more than 4 hours, fall shadows generated by the project would be less than significant.



Columbia Square

matrix environmental

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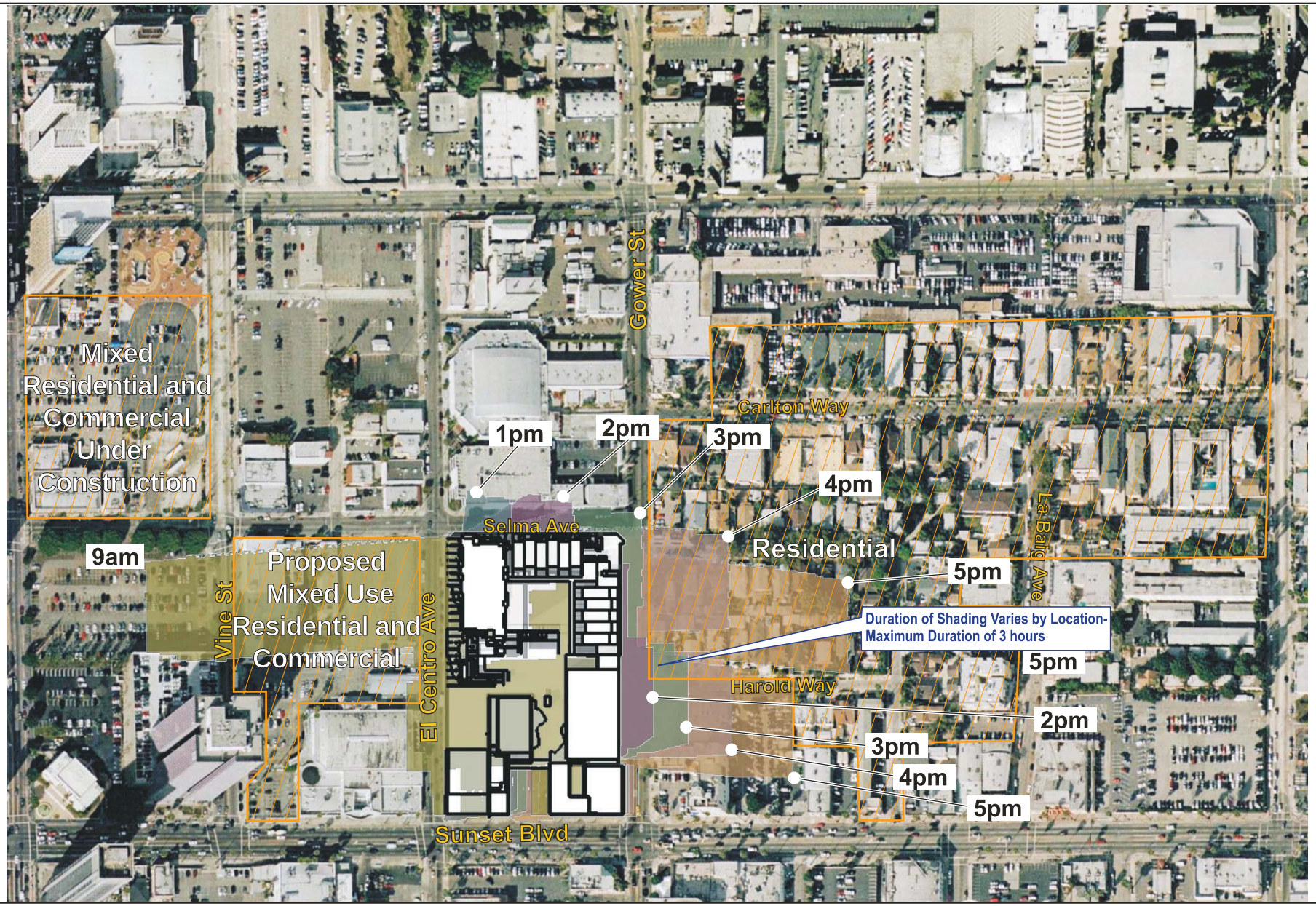
Source: PCR Services Corporation, 2008; Google Earth, 2007.

Figure IV.A-28
Spring Equinox Shadows

Source: Matrix Environmental, 2009; Google Earth, 2007



Columbia Square

matrix environmental

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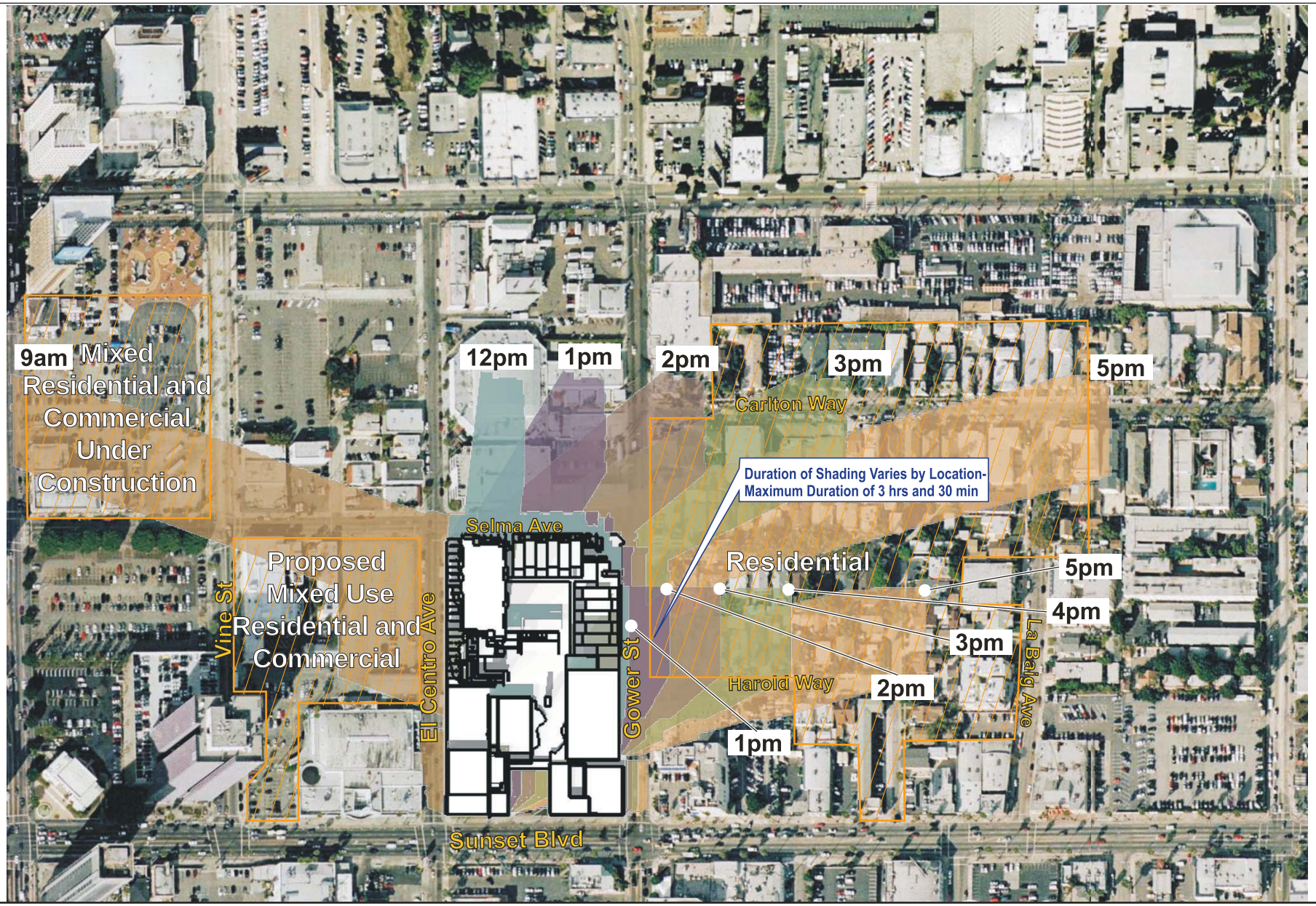
Figure IV.A-29
Summer Solstice Shadows

Source: Matrix Environmental, 2009; Google Earth, 2007



Columbia Square

matrix environmental

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0 400 800 Feet

Figure IV.A-30
Fall Equinox Shadows

Source: Matrix Environmental, 2009; Google Earth, 2007

4. Cumulative Impacts

As previously discussed, the project area has been undergoing a substantial transformation in recent years, and new and ongoing development in the vicinity includes dense mixed uses with mid-rise and some high-rise buildings. As indicated in Section III, General Description of Environmental Setting, of this Draft EIR, 94 related projects have been identified within the project study area. Many of these projects are located in close enough proximity to the project site so as to potentially contribute to cumulative impacts related to visual quality, views, light, glare, and shading. As shown in Figure III-1 in Section III, General Description of Environmental Setting, such projects are highly concentrated along Vine Street between Sunset Boulevard and Franklin Avenue, and along Hollywood Boulevard between La Brea Avenue and the 101 Freeway. Collectively, cumulative projects near the site comprise a variety of residential (apartments, condominiums, senior housing, etc.), office, hotel, retail, restaurant, and entertainment uses, consistent with existing uses in the area. While precise building designs are not yet known for much of the related development proposed in the area, based on the nature of such proposals and in light of continued population increases, it is evident that building densities are increasing in the Hollywood Community, which will likely entail general increases in the height, mass, and scale of buildings throughout the area.

a. Aesthetics/Visual Quality

From certain perspectives, many of the related projects, once complete, could enter the same or adjacent field of view as the project. Each related project would be analyzed on a case-by-case basis to determine its impact on aesthetics and to verify compliance with applicable regulatory standards. While many of the related projects represent infill development that is not anticipated to be out of scale or character with the existing visual environment, development of the project in conjunction with several of the related projects would have the potential to contrast with the overall aesthetic image of the project area. Thus, cumulative impacts associated with aesthetic character would be significant.

Based on their location in proximity to the project site, other related projects also have the potential to result in visual contrast affecting historic resources such as the Columbia Square Complex buildings that will remain and the Selma-La Baig Historic District. Thus, cumulative visual contrast impacts would be significant.

b. Views

The related projects have the potential to block views from local streets and other public vantages throughout the project area. The views most likely to be affected on a cumulative basis are north-facing views of the Hollywood Hills and Hollywood Sign. It is noted that many existing buildings currently obstruct views of these resources from public streets and open space areas, and such views are intermittent throughout the project area. As with the project, some of the related projects, particularly those involving mid- to high-rise structures, may obstruct northerly views of the Hollywood Hills and Sign. However, in general, these related projects would not interfere with northerly views along El Centro Avenue or Gower Street that are within the same fields of view potentially affected by the project structures. Furthermore, it is expected that valued views of the Hollywood Hills and Sign would continue to be available from various street segments throughout the project vicinity. However, as other related projects have the potential to affect west-facing views within the same field of view as the project site, cumulative view impacts would be significant.

c. Light/Glare

Development of the project as well as the other related projects in the area would introduce new or expanded sources of artificial light. Consequently, ambient light levels are likely to increase in the project area. However, given the location within the highly urbanized Hollywood Community, the additional artificial light sources introduced by these projects would not significantly alter the existing medium-high lighting environment that is currently created by the prominent nightlife of Hollywood. Additionally, cumulative lighting would not be expected to interfere with the performance of off-site activities given the high ambient light levels already present. Furthermore, only one of the related projects (Related Project No. 80) is sufficiently close to the project site as to cause the potential for light spillover onto the same light-sensitive properties potentially affected by the project. However, this project consists primarily of interior renovations to an existing property and is not expected to generate substantial outdoor lighting. As a result, cumulative artificial light impacts would be less than significant.

With regard to glare, it is anticipated that the related projects within the vicinity of the project site would be subject to discretionary review to ensure that building materials to be utilized would not create significant glare impacts. In addition, since the project's potential glare impacts would be eliminated through implementation of recommended mitigation, it would not contribute to any cumulative increase in glare in combination with the related project. As such, cumulative glare impacts are concluded to be less than significant.

d. Shading

Only one related project (No. 40) is located sufficiently near the project site to potentially create cumulative shading impacts in conjunction with the project. This related project, located on Sunset Boulevard near Gower Street, features high-rise development. Since shadows move in a northwesterly to northeasterly direction, the shadows of this related project would extend northwest toward the residential neighborhood immediately east of the project site during the morning hours. However, during the afternoon, such shadows would northwesterly and thus, would not overlap with project shadows. While shadows cast from this development would affect residences east of the project site, due to the location of the building, such shadows would occur during the morning hours. Therefore, cumulative shading impacts would be less than significant.

5. Mitigation Measures

(a) Construction

The following mitigation measures are proposed to reduce construction-related aesthetic impacts to less than significant levels:

Mitigation Measure A-1: Temporary fencing with screening material shall be used around the perimeter of the project site to buffer views of construction equipment and materials.

Mitigation Measure A-2: The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

(b) Operation

The following mitigation measures are proposed to reduce aesthetic impacts associated with project operations to the extent feasible and to assure that specific design features would be implemented:

Mitigation Measure A-3: The Applicant shall prepare a street tree plan to be reviewed and approved by the City's Department of Public Works, Street Tree Division. All plantings in the public right-of-way shall be installed in accordance with the approved street tree plan.

Mitigation Measure A-4: All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the City of Los Angeles Department of Planning.

Mitigation Measure A-5: All new sidewalks along the project's street frontages shall be paved with concrete or other safe, non-slip material to create an environment accommodating to pedestrians.

Mitigation Measure A-6: All new street and pedestrian lighting within the public right-of-way required for the project shall be approved by the Bureau of Street Lighting and shall be tested in accordance with the requirements of the Bureau of Street Lighting.

Mitigation Measure A-7: All new street and pedestrian lighting required for the project shall be shielded and directed away from any off-site light-sensitive uses.

Mitigation Measure A-8: Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light spillover onto adjacent properties.

Mitigation Measure A-9: All exterior windows and glass used on building surfaces shall be non-reflective or treated with a non-reflective coating.

Mitigation Measure A-10: Architectural plans showing building surface materials, particularly on the western façade of the residential tower, shall be submitted to the Planning Department for review to ensure that specific surfacing materials and trim shall not cause roadway glare.

6. Level of Significance After Mitigation

a. Aesthetics/Visual Quality

During construction, temporary impacts would occur as the site's visual appearance would be degraded due to demolition and construction activities, removal of street trees, and truck traffic. The proposed mitigation measures would screen views of construction activity and help maintain a visually attractive construction site. Furthermore, the project's proposed landscaping plan would replace all removed street trees and increase overall landscaping features. Impacts after mitigation would be less than significant.

As demonstrated throughout this analysis, the project's proposed design and landscaping improvements would, to a large extent, enhance the visual appearance of the site. In addition, the project would be consistent with applicable goals, policies, urban design guidelines, and signage standards set forth in local requirements. However, the

14-story office building would significantly contrast in size and scale with the existing historic buildings on-site, and thus, would significantly alter the historic spatial relationships. Similarly, the visual contrast introduced by the project relative to the adjacent residential neighborhood (i.e., the Selma-La Baig Historic District) would be considered a significant impact. Although substantial mitigation would be implemented to ensure a well-designed, well-maintained visual environment, such impacts would nonetheless remain significant and unavoidable.

b. Views

Valued views of the Hollywood Hills and Hollywood Sign would not be significantly obstructed as a result of the project. However, the loss of these views from the Selma-La Baig Historic District would be considered a significant impact. As feasible mitigation measures are not available to reduce or eliminate such impacts, view impacts would be significant and unavoidable.

c. Light/Glare

While the project would increase light levels on-site, the increase in ambient light would not alter the character of the area and would not interfere with nearby residential uses. In addition, implementation of the proposed mitigation measures would ensure that light impacts would be less than significant.

While acute glare conditions which hazardously interfere with driving are rare, they have the potential to occur in conjunction with the proposed residential tower. However, implementation of the proposed mitigation measures, including the use of non-reflective glass or non-reflective coatings and coordination with the City Planning Department, would reduce impacts to levels that are less than significant.

d. Shading

While project shadows would affect nearby sensitive receptors during varying portions of the day throughout the seasons of the year, impacts would be less than significant. As such, no mitigation measures would be required.

IV. Environmental Impact Analysis

B. Air Quality

1. Introduction

This section addresses the air emissions generated by the construction and operation of the project. The analysis also addresses the consistency of the project with the air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan. The analysis of project-generated air emissions focuses on whether the project would cause an exceedance of an ambient air quality standard or SCAQMD significance threshold.[1]

2. Environmental Setting

a. Regulatory Framework

A number of statutes, regulations, plans, and policies have been adopted that address air quality issues. The project site and vicinity are subject to air quality regulations developed and implemented at the federal, state, and local levels. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementation of the federal Clean Air Act (CAA). Some portions of the CAA (e.g., certain mobile source and other requirements) are implemented directly by the USEPA. Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies.

(1) Federal Clean Air Act

The CAA was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent major amendments having been enacted in 1990. The CAA requires national air quality standards, known as National Ambient Air Quality Standards (NAAQS) (see Table IV.B-1) and specifies dates for achieving compliance.

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[1] *Emissions estimation worksheets are provided in Appendix B of this EIR.*

Table IV.B-1
Ambient Air Quality Standards [a]

Pollutant	Averaging Time	California Standards [a]		Federal Standards [b]		
		Concentration [c]	Method [d]	Primary [c,e]	Secondary [c,f]	Method [g]
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m^3)		0.075 ppm (147 µg/m^3)		
Respirable Particulate Matter (PM_{10})	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	No Separate State Standard		35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	15 µg/m^3		
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m^3)	None	Non-Dispersive Infrared Photometry (NDIR)
	1 Hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	—
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (56 µg/m^3)	Gas Phase Chemiluminescence	0.053 ppm (100 µg/m^3)	Same as Primary Standard	Gas Phase Chemiluminescence
	1 Hour	0.18 ppm (339 µg/m^3)		—		
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	—	Ultraviolet Fluorescence	0.030 ppm (80 µg/m^3)	—	Spectrophotometry (Pararosaniline Method)
	24 Hour	0.04 ppm (105 µg/m^3)		0.14 ppm (365 µg/m^3)	—	
	3 Hour	—		—	0.5 ppm (1300 µg/m^3)	
	1 Hour	0.25 ppm (655 µg/m^3)		—	—	—
Lead (Pb) [h]	30 Day Average	1.5 µg/m^3	Atomic Absorption	—	—	—
	Calendar Quarter	—		0.15 µg/m^3	Same as Primary Standard	High Volume Sampler and Atomic Absorption

Table IV.B-1 (Continued)
Ambient Air Quality Standards [a]

Pollutant	Averaging Time	California Standards [a]		Federal Standards [b]		
		Concentration [c]	Method [d]	Primary [c,e]	Secondary [c,f]	Method [g]
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		**No Federal Standards**		
Sulfates (SO_4)	24 Hour	25 µg/m^3	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride [i]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

[a] *California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter (PM_{10}, and $PM_{2.5}$) and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.*

[b] *National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the USEPA for further clarification and current federal policies.*

[c] *Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.*

[d] *Any equivalent procedure which can be shown to the satisfaction of the California Air Resources Board (CARB) to give equivalent results at or near the level of the air quality standard may be used.*

[e] *National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.*

[f] *National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.*

[g] *Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.*

[h] *Note that the federal O_3 8-hour standard of 0.075 ppm became effective May 27, 2008. Prior to this, the federal standard was 0.08 ppm.*

[i] *CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.*

Source: California Air Resources Board (http://www.arb.ca.gov/research/aaqs/aaqs2.pdf, dated October 17, 2008), and U.S. Environmental Protection Agency (http://www.epa.gov/air/criteria.html and http://www.epa.gov/air/lead/pdfs/20081015_pb_naaqs_final.pdf [see "FR Notices" at http://www.epa.gov/ttn/naaqs/standards/pb/s_pb_index.html], accessed October 2008]).

States have primary responsibility for assuring air quality within their borders.[2] The CAA requires that each state submit a "State Implementation Plan" (SIP) for "implementation, maintenance, and enforcement" of NAAQS, but allows the USEPA Administrator to impose a "Federal implementation plan" if a state fails to submit a SIP or submits an inadequate SIP.[3] In California, the state Air Resources Board (CARB) is the "lead agency for all purposes related to the SIP."[4] The SCAQMD and other local air districts, as well as state agencies such as the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval.[5] SIPs must include pollution control measures, and demonstrate how the states will meet the NAAQS.

The project site is within the South Coast Air Basin (Basin), which is an area designated as non-attainment as the area does not meet NAAQS for certain pollutants regulated under the CAA.

The 1990 CAA amendments require specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and additional sanctions for failure to attain or to meet interim milestones.

The sections of the CAA which are most applicable to the project are Title I's non-attainment provisions and Title II's motor vehicle provisions.

Title I, as implemented, requires attainment of NAAQS for the following pollutants, which are called "criteria pollutants" because the Administrator has listed and issued "air quality criteria" for them pursuant to Section 108 of the CAA:[6] (1) ozone (O_3); (2) nitrogen dioxide (NO_2); (3) sulfur dioxide (SO_2); (4) particulate patter (PM_{10} and $PM_{2.5}$); (5) carbon monoxide (CO); and (6) lead (Pb). Table IV.B-1 on pages IV.B-2 and IV.B-3 shows the NAAQS currently in effect for each criteria pollutant. The NAAQS were amended in July 1997 to include an 8-hour standard for O_3 and to adopt a standard for $PM_{2.5}$. The NAAQSs were amended again in September 2006 to include an established methodology

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[2] *CAA Sec. 107.*

[3] *CAA Secs. 107 and 110.*

[4] *California State Implementation Plan (SIP), http://www.arb.ca.gov/planning/sip/sip.htm (accessed July 2008).*

[5] *Ibid.*

[6] *Under Sec. 108, for each pollutant the Administrator lists, he or she issues "air quality criteria" that "reflect the latest scientific knowledge useful in indicating the kind and extent of all identifiable effects on public health or welfare which may be expected from the presence of such pollutant in the ambient air, in varying quantities."*

for calculating $PM_{2.5,}$ to strengthen the 24-hour $PM_{2.5}$ standard, and to revoke the annual PM_{10} standard. Deadlines for meeting the NAAQS within the Basin include the following:[7] (1) 1-hour O_3 by the year 2010;[8] (2) 8-hour O_3 by the year 2024; (3) PM_{10} by the year 2006; and (4) $PM_{2.5}$ by the year 2015. Although the deadline for PM_{10} has passed, the Basin met the PM_{10} standard then at all stations except for western Riverside.[9]

Non-attainment designations are categorized into seven levels of severity: (1) basic, (2) marginal, (3) moderate, (4) serious, (5) severe-15, (6) severe-17, and (7) extreme.[10] Although previously was not in attainment for CO, the Basin is now in attainment for that pollutant. On June 11, 2007, the USEPA reclassified the Basin as a federal attainment area for CO and approved the Basin's CO maintenance plan[11]. The Basin fails to meet national standards for O_3, PM_{10}, and $PM_{2.5}$ and therefore is considered a Federal non-attainment area for these pollutants. Table IV.B-2 on page IV.B-6 lists the criteria pollutants and the Basin's current attainment status.

Title II of the CAA pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in progressively more stringent standards to reduce tailpipe emissions from vehicles. For example, the current standards for oxides of nitrogen (NO_X) emissions and for cleaner burning gasoline are substantially more stringent than those first promulgated.

In California, mobile source emission control is primarily a state responsibility. CARB sets and enforces emission standards for motor vehicles and fuels (and consumer products as well), while it oversees and assists local air quality districts (including the SCAQMD), which regulate most non-vehicular sources of air pollution.[12]

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[7] *South Coast Air Quality Management District, 2007 AQMP.*

[8] *The USEPA has revoked the 1-hour O_3 standard, but the SCAQMD (and others) sued to overturn the revocation. The district's AQMP mentions this, and still addresses attainment of the 1-hour standard. The deadline is still in the CAA (Sec. 181; 42 U.S.C. § 7511).*

[9] *South Coast Air Quality Management District, 2007 AQMP.*

[10] *The "-15" and "-17" designations reflect the number of years within which attainment must be achieved.*

[11] *"Approval and Promulgation of Implementation Plans and Designation of Areas for Air Quality Planning Purposes: California, Final Rule." Federal Register 72 (11 May 2007):26718-26721.*

[12] *Introduction to the Air Resources Board, http://www.arb.ca.gov/html/brochure/arb.htm (accessed July 2008).*

Table IV.B-2
South Coast Air Basin Attainment Status

Pollutant	National Standards	California Standards
Ozone (1-hour standard)	N/A [a]	Non-attainment
Ozone (8-hour standard)	Extreme	N/A
Carbon Monoxide	Attainment [b]	Attainment [c]
Nitrogen Dioxide	Attainment [c]	Attainment [c]
Sulfur Dioxide	Attainment [c]	Attainment [c]
PM_{10} (24-hour standard)	Serious	Non-attainment
PM_{10} (annual standard)	N/A [d]	Non-attainment
$PM_{2.5}$	Serious	Non-attainment
Lead	Attainment [c]	Attainment [c]
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment [c]
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride	N/A	N/A [e]

N/A = not applicable

[a] *This national standard was revoked on June 15, 2005, for all areas except for some outside California.*
[b] *The Basin was officially reclassified as in attainment for carbon monoxide by the USEPA on June 11, 2007. "Approval and Promulgation of Implementation Plans and Designation of Areas for Air Quality Planning Purposes: California, Final Rule." Federal Register 72 (11 May 2007):26718-26721*
[c] *An air basin is designated as being in attainment for a pollutant if the standard for that pollutant was not violated at any site in that air basin during a three year period.*
[d] *This national standard was revoked on September 21, 2006.*
[e] *Although there is a state ambient air quality standard for vinyl chloride, the California Air Resources Board does not monitor or make status designations for this pollutant, which is subject to source-specific toxic air contaminant control measures.*

Source: USEPA Region 9 and California Air Resources Board.

(2) California Clean Air Act

The California Clean Air Act, signed into law in 1988, requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practicable date achievable by application of all reasonably available control measures and technologies. Table IV.B-1 shows the CAAQS currently in effect for each of the criteria pollutants as well as the other pollutants recognized by the state. As shown in Table IV.B-1, the CAAQS include more stringent standards than the NAAQS for most of the criteria air pollutants. In addition to setting its own standards for NAAQS pollutants, California has also set ambient standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. In general, the California standards are more health protective than the corresponding NAAQS. Table IV.B-2 provides the Basin's attainment status with respect to criteria pollutants which have both federal and state standards. The Basin

complies with the CAAQS for sulfates, hydrogen sulfide, and vinyl chloride, but does not meet the California standard for visibility-reducing particles.

(3) California Air Resources Board Air Quality and Land Use Handbook

The California Air Resources Board (CARB) published its *Air Quality and Land Use Handbook* (CARB Handbook) in April 2005.[13] The CARB Handbook serves as a general guide for considering impacts to sensitive receptors from facilities that emit toxic air contaminants (TACs). The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. Nevertheless, CEQA lead agencies often refer to the CARB Handbook's siting recommendations. Therefore, this document addresses those recommendations as they relate to the project. The goal of the CARB guidance is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from excessive exposure to TAC emissions. Some examples of the CARB Handbook's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of freeways and high-traffic roads (i.e., roads within urbanized areas carrying more than 100,000 vehicles per day); (2) avoid siting sensitive receptors within 1,000 feet of a distribution center; and (3) avoid siting sensitive receptors within 300 feet of a single-machine dry cleaning operation using perchloroethylene (or within 500 feet of a dry cleaner with two machines).[14]

(4) California Air Resources Board Emission Control Measures

In 2004, CARB adopted a control measure to limit commercial heavy duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter (DPM) and other air contaminants.[15] The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate

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[13] *California Air Resources Board, "Air Quality and Land Use Handbook: A Community Health Perspective" (April 2005): http://www.arb.ca.gov/ch/handbook.pdf (accessed Aug. 2008). The CARB Handbook is incorporated in full herein by reference pursuant to Calif. Code of Regulations, Title 14, Sec. 15150. The main text following this footnote briefly describes the document. The CARB Handbook both describes and is part of the regulatory environment of this report.*

[14] *California Air Resources Board, "Air Quality and Land Use Handbook: A Community Health Perspective" (April 2005): http://www.arb.ca.gov/ch/handbook.pdf, p. 4. See also http://www.arb.ca.gov/ch/-landuse.htm.*

[15] *Calif. Code of Regulations, Title 13, Sec. 2485. See http://www.arb.ca.gov/regact/idling/idling.htm (accessed July 2008).*

on highways, regardless of where they are registered. In general, it prohibits idling for more than 5 minutes at any location.

In addition to limiting exhaust from idling trucks, CARB promulgated emission standards for off-road diesel construction equipment such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. A CARB regulation that became effective on June 15, 2008, aims to reduce emissions by installation of diesel soot filters and encouraging the replacement of older, dirtier engines with newer emission controlled models.[16] A prohibition against acquiring certain vehicles begins on March 1, 2009, and a reporting requirement starts on April 1, 2009. Implementation of some provisions is staggered based on fleet size, with the largest operators to begin compliance in 2010. By 2020, CARB estimates that DPM will be reduced by 74 percent and smog forming NOx (another important pollutant emitted from diesel engines) by 32 percent, compared to what emissions would be without the regulation.[17]

(5) South Coast Air Quality Management District

The SCAQMD has jurisdiction over an area of approximately 10,743 square miles. The South Coast Air Basin consists of the land and air above approximately 6,745 square miles of the SCAQMD's jurisdiction. The Basin includes portions of Los Angeles, Riverside, and San Bernardino counties and all of Orange County. While its air quality has improved, the Basin requires continued diligence to meet air quality standards.

The SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet national air quality standards. Every three years, the district prepares an AQMP for inclusion in a SIP to be submitted to the USEPA.[18] The introduction to the 2007 AQMP notes that it "employs the most up-to-date science and analytical tools and incorporates a comprehensive strategy aimed at controlling pollution from all sources."[19] It "incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes and new air quality modeling

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[16] *Calif. Code of Regulations, Title 13, Secs. 2449, 2449.1, 2449.2 and 2449.3. See http://www.arb.ca.gov/regact/2007/ordiesl07/ordiesl07.htm (accessed July 2008).*

[17] *California Air Resources Board (CARB), Technical Support Document: Regulation for In-Use Off-Road Diesel Vehicles (April 2007), http://www.arb.ca.gov/regact/2007/ordiesl07/TSD.pdf, pp. 135-137.*

[18] *http://aqmd.gov/aqmp/AQMPintro.htm (accessed July 2008).*

[19] *SCAQMD, Final 2007 Air Quality Management Plan, http://aqmd.gov/aqmp/07aqmp/aqmp/-Complete_Document.pdf (accessed July 2008 from http://aqmd.gov/aqmp/07aqmp/index.html), p. ES-2.*

tools."[20] The AQMP builds upon measures contemplated by "responsible agencies" to achieve national standards for air quality in the Basin and parts of the Salton Sea Air Basin that are under district jurisdiction.[21] In addition, it "aims to incorporate all feasible control measures while balancing costs and socioeconomic impacts."[22]

The "2007 AQMP relies on a comprehensive and integrated control approach aimed at achieving the $PM_{2.5}$ standard by 2015...and achieving the 8-hour ozone standard by 2024...."[23] The SCAQMD expects that to attain the 8-hr ozone standard by 2024 "will require significant additional reductions above and beyond those necessary for $PM_{2.5}$ attainment," which will "be achieved through implementation of new and advanced control technologies as well as improvement of existing technologies."[24] Some of the required control technologies have yet to be invented.[25]

The AQMP control measures "consist of four components: 1) the District's Stationary and Mobile Source Control Measures; 2) CARB's Proposed Revised Draft State Strategy; 3) District Staff's Proposed Policy Options to Supplement CARB's Control Strategy; and 4) Regional Transportation Strategy and Control Measures provided by SCAG" (the Southern California Association of Governments).[26]

The first component, SCAQMD's own control strategy for stationary and mobile sources, "is based on the following approaches: 1) facility modernization; 2) energy efficiency and conservation; 3) good management practices; 4) market incentives/compliance flexibility; 5) area source programs; 6) emission growth management; and 7) mobile source programs."[27] The second component, written by CARB, is a plan, focused on ozone and $PM_{2.5}$, for state compliance with the federal Clean Air Act.[28] The third component consists

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[20] *Ibid, p. ES-2.*

[21] *Ibid.*

[22] *Ibid, p. ES-8.*

[23] *Ibid.*

[24] *Ibid, p. ES-13.*

[25] *Section 182(e)(5) of the CAA authorizes including such measures — so-called "black box" measures — when SIPs address extreme nonattainment areas. See SCAQMD, Final 2007 Air Quality Management Plan, http://aqmd.gov/aqmp/07aqmp/aqmp/-Complete_Document.pdf (accessed July 2008 from http://aqmd.gov/aqmp/07aqmp/index.html), p. ES-2.*

[26] *SCAQMD, Final 2007 Air Quality Management Plan, http://aqmd.gov/aqmp/07aqmp/aqmp/-Complete_Document.pdf (accessed July 2008 from http://aqmd.gov/aqmp/07aqmp/index.html), p. 4-5.*

[27] *Ibid, p. 4-6.*

[28] *See Ibid, pp. 4-34 – 4-42.*

of ways to provide additional reductions in mobile source emissions, beyond the reductions identified in CARB's mobile source control strategy, in order for the South Coast Air Basin to attain the national ambient air quality standard for $PM_{2.5}$ by 2015.[29] The fourth component provides air pollution control through transportation planning and by funding transportation measures (some of which are called "Transportation Control Measures"), including infrastructure improvements and extensions, bus fleet expansion, and acquisition of rolling stock for rail use.[30]

The SCAQMD adopts rules and regulations to implement portions of the AQMP. Several of these rules may apply to construction or operation of the project. For example, SCAQMD Rule 403 requires the implementation of best available fugitive dust control measures during active construction periods capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. The full text of SCAQMD Rule 403 is included in Appendix B of this EIR.

The SCAQMD published the *CEQA Air Quality Handbook* (the Handbook) in 1993 to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts in accordance with the California Environmental Quality Act (CEQA).[31] The Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. However, the SCAQMD is currently in the process of replacing the Handbook with the "Air Quality Analysis Guidance Handbook."[32] While this process is underway, the SCAQMD recommends that the lead agency avoid using the screening tables in the Handbook's Chapter 6, because the tables were derived using an obsolete version of CARB's mobile source emission factor inventory, and the trip generation characteristic of the land uses identified in these screening tables were based on the fifth edition of the ITE Trip Generation Manual, instead of the most current edition. Additionally, the lead agency should avoid using certain on-road mobile source emission factors. The SCAQMD instead recommends using other approved models to calculate emissions from land use projects, such as the URBEMIS 2007 model. [33]

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[29] *See Ibid, pp. 4-43 – 4-54.*

[30] *See Ibid, pp. 4-25 – 4-30.*

[31] *SCAQMD, CEQA Air Quality Handbook (April 1993; portions "Changed November 1993").*

[32] *http://www.aqmd.gov/ceqa/hdbk.html (accessed July 2008).*

[33] *http://www.aqmd.gov/ceqa/oldhdbk.html (accessed July 2008).*

In addition, in June 2003, the SCAQMD published a guidance document called "Localized Significance Threshold Methodology" that is intended to provide guidance for lead agencies evaluating localized air quality impacts that would be caused by emissions of CO, NO_x and PM_{10} from projects.[34] In October 2006, the SCAQMD adopted similar guidance regarding $PM_{2.5}$ in a document called "Final – Methodology to Calculate Particulate Matter $PM_{2.5}$ and $PM_{2.5}$ Significance Thresholds."[35] These documents were also consulted in the preparation of this analysis.

The SCAQMD has also published land use planning guidelines in the May 2005 "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning"[36] which, like the CARB Handbook, considers impacts to sensitive receptors from facilities that emit TACs. The SCAQMD guidance document cites the distance recommendations provided by CARB in the CARB Handbook (e.g., for distribution centers and dry cleaning facilities), but recommends consulting SCAQMD "to obtain facility-specific emissions information and accepted assessment methods for determining relative exposure and health risk for projects."[37] These SCAQMD guidelines are voluntary initiatives recommended for consideration by local planning agencies and CEQA lead agencies.[38]

(6) Regional Comprehensive Plan and Guide

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. SCAG is the federally designated metropolitan planning organization (MPO) for the majority of the Southern California region and is the largest MPO in the nation. As the designated MPO, SCAG is mandated by the federal government to develop and implement regional plans that address transportation, growth management, hazardous waste management and air quality issues. With respect to air quality planning, SCAG prepared and, in 1994, adopted, the Regional Comprehensive Plan and Guide (RCPG), which includes Growth

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[34] *See SCAQMD Localized Significance Thresholds at http://www.aqmd.gov/ceqa/handbook/LST/LST.html.*

[35] *See SCAQMD, Particulate Matter (PM) 2.5 Significance Thresholds and Calculation Methodology at http://www.aqmd.gov/ceqa/handbook/pm2_5/pm2_5.html.*

[36] *SCAQMD Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, http://www.aqmd.gov/prdas/aqguide/doc/aq_guidance.pdf (accessed July 2008 from http://www.aqmd.gov/prdas/aqguide/aqguide.html), Chapter 2.*

[37] *Ibid., p. 2-4.*

[38] *See Ibid., Preface and p. 2-5.*

Management[39] and Regional Mobility[40] chapters that provide control measures and a basis for emission projections, air quality forecasts and other analyses contained in the SCAQMD's AQMP.[41] The SCAG Regional Council recently accepted a 2008 Regional Comprehensive Plan[42] that presumably will be incorporated into future iterations of the AQMP.

(7) City of Los Angeles Green Building Ordinance

On Earth Day (April 22) 2008, the Mayor of the City of Los Angeles signed a green building ordinance (Ordinance No. 179820) to address the impact on climate change from new development. The ordinance established the Green Building Program, whereby certain new development projects of 50,000 square feet or more or with more than 50 residential units must at a minimum meet the intent of the "Certified" performance level under the US Green Building Council's (USGBC) Leadership in Energy and Environmental and Design program (LEED®). In meeting this requirement, the developer must submit a LEED® checklist, provide a signed declaration from a LEED®-accredited professional stating that the project meets the intent of LEED® certification, and provide a set of plans that identifies the LEED measures. This green building ordinance also includes a provision to expedite Department of City Planning processing for building projects that commit to obtaining a "Silver" LEED® designation from the USGBC.

(8) Global Climate Change

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena, however data indicate that the current global conditions differ from past climate changes in rate and magnitude.

According to the Intergovernmental Panel on Climate Change (IPCC), the recent (within the last approximately 250 years) increase in atmospheric greenhouse gases is

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[39] *SCAG, Regional Comprehensive Plan and Guide, Growth Management, http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGGrowthManagementChapter.pdf.*

[40] *SCAG, Regional Comprehensive Plan and Guide, Regional Mobility, http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGRegionalMobilityChapter.pdf.*

[41] *SCAG has released a 2008 Draft Regional Comprehensive Plan. See http://www.scag.ca.gov/rcp/draft.htm.*

[42] *http://www.scag.ca.gov/rcp/index.htm, Accessed November 2008.*

largely the result of human activities, namely fossil fuel combustion, land use changes and agriculture.[43]

GHGs are those compounds in the Earth's atmosphere that play a critical role in determining the Earth's surface temperature. Specifically, these gases allow high-frequency solar radiation to enter the Earth's atmosphere, but retain the low frequency energy which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect.[44]

Increased concentrations of GHGs in the Earth's atmosphere have been linked to global climate change and such conditions as rising surface temperatures, melting icebergs and snowpack, rising sea levels, and the increased frequency and magnitude of extreme weather conditions.[45]

GHGs include carbon dioxide (CO_2), methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), hydrofluorocarbons (HFCs) and perfluorinated compounds. Water vapor is the most abundant GHG in the atmosphere.[46] Nevertheless, water vapor is not included in the definition of "greenhouse gases" covered by the main state law on climate change, the California Global Warming Solutions Act of 2006 ("AB 32"), which is discussed below. Ozone is also not included.[47] By 2006, when the global warming law was enacted, control of ozone near the earth's surface (in the troposphere) was already a primary objective of well-established federal and state programs discussed above. In addition, efforts to stop destruction of the ozone layer in the stratosphere appear to have been successful, and, as a GHG, ozone is more of a concern in the troposphere than in the stratosphere.[48] Water vapor, on the other hand, is generally not regulated as an air

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[43] *IPCC, Climate Change 2007 - The Physical Science Basis: Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. (Cambridge University Press, 2007.) "Summary for Policymakers," http://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4-wg1-spm.pdf, p.2, "Technical Summary," http://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4-wg1-ts.pdf, pp. 25 – 28 and 81, and "Frequently Asked Questions," http://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4-wg1-faqs.pdf, pp. 100 – 102 and 115 – 116 (all accessed July 2008 from http://www.ipcc.ch/ipccreports/ar4-wg1.htm).*

[44] *Ibid, "Frequently Asked Questions," pp. 98 – 99.*

[45] *Ibid., "Technical Summary," pp. 52 – 53 and 81 – 86.*

[46] *National Oceanic and Atmospheric Administration, "Greenhouse Gases: Frequently Asked Questions:" at http://lwf.ncdc.noaa.gov/oa/climate/gases.html#wv (accessed June 2008).*

[47] *Health and Safety Code Sec. 38505(g).*

[48] *IPCC, Climate Change 2007 - The Physical Science Basis: Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. (Cambridge University Press, 2007.) "Technical Summary," p. 28. Accessed July 2008 from at http://www.ipcc.ch/ipccreports/ar4-wg1.htm.*

pollutant, as it appears in the atmosphere primarily through natural causes. An IPCC working group noted, "Direct emission of water vapour by human activities makes a negligible contribution to radiative forcing."[49] Radiative forcing is an index of a substance's or other factor's potential to affect the energy balance in the Earth-atmosphere system and hence cause climate change.[50] Global warming itself increases concentrations of water vapor in the atmosphere, by increasing rates of evaporation; "and this represents a key feedback but not a forcing of climate change."[51] The IPCC working group found that "Direct emission of water to the atmosphere by anthropogenic activities, mainly irrigation, is a possible forcing factor but corresponds to less than 1 percent of the natural sources of atmospheric water vapour. The direct injection of water vapour into the atmosphere from fossil fuel combustion is significantly lower than that from agricultural activity."[52] This EIR therefore focuses on GHGs other than ozone and water vapor.

GHGs are the result of both natural and anthropogenic activities. Primary sources of GHG emissions include fossil fuel consumption for power generation, transportation, heating and cooking, as well as forest fires, decomposition, landfills, and industrial processes. According to the California Energy Commission (CEC), emissions from fossil fuel consumption represented approximately 81 percent of California's anthropogenic GHG emissions in 2004, while 41 percent of all such emissions in the State came from the transportation sector of the economy.[53]

Despite considerable advances in global climate change science, significant uncertainties remain about the individual processes involved and how they affect each other. Ordinary localized weather prediction is not a precise science. Weather prediction, expanded to a global scale, and including the effects of GHG emissions, may never be precise. As a result of these uncertainties it is currently impossible to link an individual development project with future specific impacts on global climate change on a scientific basis.

In response to growing scientific and political concern regarding global climate change, California has recently adopted a series of laws to reduce emissions of GHGs to the atmosphere from commercial and private activities within the State. In July 2002, Governor Gray Davis signed Assembly Bill (AB) 1493, requiring the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases"

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[49] *Ibid, p. 28.*

[50] *Ibid, p. 21. The IPCC report expresses radiative forcing values in Watts per square meter (W m^{-2}).*

[51] *Ibid, p. 28.*

[52] *Ibid.*

[53] *State of California. Energy Commission, http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF.*

emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. However, setting emission standards for automobiles is the responsibility of the USEPA. The CAA allows States to set state-specific emission standards on automobiles only if they first obtain a waiver from the USEPA. While the USEPA denied California's request for a waiver on December 19, 2007, thereby possibly delaying CARB's proposed implementation schedule, Governor Arnold Schwarzenegger has challenged the decision in court and the new federal administration has indicated that it may now support the waiver.[54] When implementing regulations are fully implemented and older cars are replaced with AB 1493- compliant vehicles, there will be further reduction in GHGs from trips to and from the project.

In June 2005, Governor Schwarzenegger signed Executive Order S-3-05, which established GHG emissions targets for the state through the year 2050, as well as a process to coordinate efforts to meet the targets. The order directed the Secretary for California EPA to report every two years on the State's progress toward meeting the Governor's GHG emission reduction targets. The targets set by Executive Order S-3-05 are the following:

- 2000 GHG emission levels by 2010 (which represents an approximately 11 percent reduction from business as usual);
- 1990 levels by 2020 (25 percent below business as usual); and
- 80 percent below 1990 levels by 2050

As a result of the executive order, the California Climate Action Team (CAT), led by the Secretary of the California EPA, was formed. The CAT is made up of representatives from a number of State agencies and was formed to implement global warming emission reduction programs and reporting on the progress made toward meeting statewide targets established under the Executive Order. State agency members include the Business, Transportation and Housing Agency; Department of Food and Agriculture; Resources Agency; Air Resources Board; California Energy Commission; the Public Utilities Commission; and Department of Water Resources. The CAT published its *Climate Action Team Report to Governor Schwarzenegger and the Legislature* in March 2006, in which it laid out forty-six specific emission reduction strategies for reducing GHG emissions and reaching the targets established in the executive order.

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[54] *Barack Obama, White House Memorandum for the Administrator of the Environmental Protection Agency, January 26, 2009, available online at http://www.whitehouse.gov/the_press_office/ Presidential_Memorandum_EPA_Waiver/, accessed May 8, 2009.*

In September 2006, Governor Arnold Schwarzenegger signed AB 32, enacting the California Global Warming Solutions Act of 2006. AB 32 commits the State via statute to the 2020 GHG emissions level that Executive Order S-2-05 set as a target. After 2020, the executive order will remain in force with respect to its 2050 target, unless modified by the current or a future Governor. To achieve its goal, AB 32 mandates that CARB quantify the emissions cap (1990 emissions level), 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.

Senate Bill (SB) 1368, a companion bill to AB 32, requires the California Public Utilities Commission (PUC) and CEC to establish GHG emission 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.

On December 6, 2007, the California Air Resources Board adopted the quantified statewide GHG emissions limit for the year 2020. The limit is 427 million metric tons of carbon dioxide equivalents ($MMTCO_2e$), which CARB found to be the 1990 GHG emissions level.[55] CARB held open the possibility of changing the limit "if additional information becomes available that would significantly change the 1990 […] level."[56]

CARB has also promulgated GHG emission reporting and verification requirements to implement the law. A post-adoption public comment period on CARB's "Regulation for the Mandatory Reporting of Greenhouse Gas Emissions" closed on June 5, 2008.[57] This regulation requires GHG emissions reporting to be verified by CARB-accredited verifiers beginning with reports submitted in 2010 (for 2009 emissions).[58]

On June 21, 2007, CARB approved an AB 32-mandated list of discrete early action measures that can be implemented before January 1, 2011.[59] These discrete early action measures focus on major statewide contributing sources and industries, not on individual development projects or practices. The three discrete early action measures CARB adopted are: 1) a low-carbon fuel standard; 2) reduction of refrigerant losses from motor

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[55] *See California Air Resources Board, California 1990 Greenhouse Gas Emissions Level and 2020 Limit, http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm.*

[56] *CARB Resolution 07-55, December 6, 2007.*

[57] *See http://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep.htm.*

[58] *Calif. Code of Regulations, Title 17, Sec. 95103.*

[59] *Health and Safety Code § 38560.5(a), enacted by AB 32, mandated publication of the list by June 30, 2007.*

vehicle air conditioning system maintenance, by restricting the sale of "do-it-yourself" automotive refrigerants; and 3) increased methane capture from landfills.[60] On September 7, 2007, CARB staff proposed additional early action measures,[61] some of which, including shore power for ships in port,[62] have since been adopted by the board.

A bill enacted in 2007, SB 97 (Dutton, Stats. 2007, ch. 185), requires the Governor's Office of Planning and Research (OPR) to prepare and develop guidelines for mitigation required by CEQA of GHG emissions and the effects of GHG emissions. The bill, whose mandates are now part of CEQA, set a deadline of July 1, 2009 for OPR to send such guidelines to the Resources Agency. The Resources Agency has until January 1, 2010, to certify and adopt guidelines prepared and developed by OPR.

OPR, "[i]n the interim," has issued a Technical Advisory offering "informal guidance" about how CEQA lead agencies should address climate change.[63] In that advisory, OPR notes that each public agency that is a CEQA lead agency "needs to develop its own approach to performing a climate change analysis for projects that generate GHG emissions."[64] Nevertheless, for such projects, "compliance with CEQA entails three basic steps:" quantifying GHG emissions, assessing the (individual and cumulative) significance of their impact on climate change, and if the impact is found to be significant, identifying alternatives or mitigation measures "that will reduce the impact below significance."[65] "In the absence of" standards or data that "clearly define what constitutes a 'significant impact,' individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice."[66] Attached to the Technical Advisory is a list of references and information sources and (to help with project-by-project consideration of emission reduction or mitigation measures) a list of examples of GHG reduction measures.

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[60] *California Air Resources Board, California Environmental Protection Agency, California Moves Swiftly to Further Address Climate Change Emissions, Early Action Items Approved Today, http://www.arb.ca.gov/newsrel/nr062107.htm.*

[61] *See California Air Resources Board, California Environmental Protection Agency, ARB Staff Proposes to Triple Early Action Measures Required Under AB 32 http://www.arb.ca.gov/newsrel/nr090707.htm.*

[62] *See California Air Resources Board, California Environmental Protection Agency, Shore Power for Ocean-going Vessels, http://www.arb.ca.gov/ports/shorepower/shorepower.htm.*

[63] *State of California, Governor's Office of Planning and Research, "CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review" (June 19, 2008), http://www.opr.ca.gov/download.php?dl=ceqa/pdfs/june08-ceqa.pdf. (Quoted: p. 2.)*

[64] *Ibid, p. 5.*

[65] *Ibid.*

[66] *Ibid, p. 6.*

"Although climate change is ultimately a cumulative impact," the OPR advisory says that "not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."[67] In the advisory, OPR suggests that using previously approved plans or mitigation programs "that have adequately analyzed and mitigated GHG emissions to a less than significant level" may be "a means to avoid or substantially reduce the cumulative impact of a project."[68] The advisory points to governments and organizations that have developed guidebooks, strategies and other measures to address GHG emissions, and suggests such activity is helpful because CEQA can be a more effective tool for analyzing and mitigating GHG emissions if it is supported by "sound development policies and practices" "on a broad planning scale."[69]

In addition, OPR also released Preliminary Draft Amendments to the CEQA Guidelines on January 8, 2009. These draft amendments recommend that a quantitative analysis of greenhouse gas emissions be provided in CEQA documents and that mitigation measures be included to address potentially significant impacts. In addition, the draft amendments to the CEQA Guidelines further state that it is up to the lead agencies to establish significance thresholds, consistent with the existing CEQA framework. However, as of March 2009, agencies such as CARB, SCAQMD and the City of Los Angeles have not adopted GHG significance thresholds for individual projects.

In addition to CEQA guidance, State agencies are preparing a "scoping plan" mandated by AB 32. The law requires that the scoping plan be a plan "for achieving the maximum technologically feasible and cost-effective reductions in greenhouse gas emissions from sources or categories of sources of greenhouse gases by 2020." It must include "recommendations on direct emission reduction measures, alternative compliance mechanisms, market-based compliance mechanisms, and potential monetary and nonmonetary incentives," as well as an evaluation of "the total potential costs and total potential economic and noneconomic benefits of the plan . . . to California's economy, environment, and public health." In addition, as part of preparing the plan, the CARB must "recommend a de minimis threshold of greenhouse gas emissions below which emission reduction requirements will not apply."[70]

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[67] *Ibid.*

[68] *Ibid.*

[69] *Ibid, pp. 7-8.*

[70] *Calif. Health and Safety Code § 38561.*

CARB approved the Climate Change Scoping Plan (Scoping Plan) on December 11, 2008. The Scoping Plan reiterates the goal of AB32 to reduce GHG emissions to 1990 levels by 2020. The Scoping Plan indicates that cutting GHG emissions to 1990 levels equates to an approximately 30 percent reduction state-wide from "business as usual" emission levels for 2020, or roughly a 15 percent reduction from current levels. The Scoping Plan also characterizes business as usual in the context of AB32 as a representation of California's economy in the year 2020, assuming that none of the recommended actions outlined in the Scoping Plan are implemented. The Scoping Plan outlines ways in which various sectors, such as electricity generation, goods movement, refineries, landfills, etc., can utilize various measures to reduce GHG emissions, and quantifies the impact of these measures. The Scoping Plan does not specifically address emission reduction targets for development projects such as the proposed project. Land use regulation is the focus of another statute that was enacted to promote GHG emission reductions. SB 375 (Steinberg, Stats. 2008, ch. 728) enacted three complementary land use-related components. The first, transportation planning, involves standardizing the travel demand models used by regional planning organizations, giving each regional planning organization a GHG emission reduction target, requiring the development of "sustainable communities strategies" (SCSs), and requiring that certain planning activities be consistent with SCSs. Billions of dollars in federal and state transportation subsidies hinge on CARB acceptance of SCSs or, as an alternative, regional planning organizations' submittal of alternative planning strategies to meet their GHG emission reduction targets.[71] The second component involves mandates related to housing. It includes requiring timetables for implementation programs of housing elements of city and county general plans, requiring that one specific action in the timetables be rezoning to accommodate certain income-based housing needs, imposing mandatory approval of certain housing development projects on localities that fail to complete the required rezoning on time, with few exceptions, and allowing courts to compel local governments to rezone as required (with sanctions and burden of proof requirements to encourage compliance). The third component involves changes in CEQA. This portion of SB 375 involves an exemption from CEQA or relaxation of CEQA requirements for certain projects. It involves a new category of project, "transit priority project" (TPP), and a subcategory of TPP called "sustainable communities project" (SCP). To qualify as an SCP, a project must be consistent with its region's SCS and meet some other requirements. SCPs will be exempt from CEQA, and other TPPs will be subject to only limited CEQA review — via a new type of CEQA document, a "sustainable communities environmental assessment," or a limited environmental impact report. Certain other mixed-use residential developments, if consistent with the main elements of an SCS or an alternative planning strategy, will be

[71] *The New York Times, "California Moves on Bill to Curb Sprawl and Emissions," by Felicity Barringer, August 28, 2008.*

exempt from including in their CEQA documentation information about growth-inducing impacts or impacts from car or light-duty truck trips on global warming. SB 375 will take effect January 1, 2009, however, its requirements will be implemented over the next several years.

At the local level, in 2007 the City of Los Angeles published *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan)*,[72] outlining the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the *LA Green Plan*, the City of Los Angeles is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels. To achieve this, the City will increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

Recognizing the relationship between land use and GHG emissions, the City of Los Angeles has developed a Green Building Ordinance standard in its Municipal Code that uses the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED®) Green Building Rating System as the standard for which a project will be measured as a green building. The Green Building Ordinance requires all applicable projects to submit a Checklist and supporting documentation to indicate that the project would achieve the number of points needed to achieve the "Certified" level. In addition, projects that voluntarily commit to achieving a "Silver" level or higher will receive expedited processing from the City's Department of City Planning.

There has also been activity at the federal level with respect to the regulation of GHGs. In *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), argued November 29, 2006 and decided April 2, 2007, the U.S. Supreme Court held that EPA has authority to regulate GHGs, and that EPA's reasons for not regulating GHGs did not fit statutory requirements. As such, the Court ruled that the EPA could be required to regulate CO_2 and other greenhouse gases as pollutants under the Clean Air Act. However, EPA has not yet developed a regulatory program for greenhouse gas.

(9) Potential Health Impacts

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants,

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[72] *City of Los Angeles, Green LA, An Action Plan to Lead the Nation in Fighting Global Warming, http://www.lacity.org/ead/EADWeb-AQD/GreenLA_CAP_2007.pdf.*

due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in the prevalent air quality.

The following pollutants are regulated by the EPA or CARB and therefore are subject to emission reduction measures adopted by federal, state and other regulatory agencies.

Ozone (O_3): Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds (VOC) and nitrogen oxides (NOx) under meteorological conditions such as high temperature and stagnation episodes. An elevated level of ozone irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower the lung efficiency.

Carbon Monoxide (CO): Carbon monoxide is primarily emitted from combustion processes and motor vehicles because of incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of moderate levels of carbon monoxide can cause nausea, dizziness, and headaches, and can be fatal at high concentrations.

Particulate Matter (PM_{10} and $PM_{2.5}$): Most visible particles in the air (dust and soot) do not get deep into human lungs. However, small particles, with an aerodynamic diameter equal to or less than ten microns (PM_{10}) and even smaller particles with a aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), can pass through the nose, throat, and upper respiratory tract, and reach delicate lung tissue. Some small particulates may enter the bloodstream. Particulate matter can potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulate could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Nitrogen Oxides (NOx): Major sources of NOx include power plants, large industrial facilities, and motor vehicles. Nitrogen oxides are emitted from combustion processes and irritate the nose and throat. NOx increases susceptibility to respiratory infections, especially in people with asthma. The principal concern with NOx is its role as a precursor to the formation of ozone.

Sulfur Dioxide (SO_2): Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. Sulfur dioxide potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Sulfates: Sulfates (SO_4^{2-}) are the fully oxidized ionic form of sulfur. Sulfur dioxide emitted from the combustion of sulfur-containing fuels is converted to sulfate compounds in the atmosphere. The conversion of SO_2 to sulfates takes place comparatively rapidly and completely in urban areas of California due to regional meteorological features. Elevated levels of sulfate can decrease ventilatory function, aggravate asthma symptoms, and increase the risk of cardio-pulmonary disease. (In addition, sulfates are particularly effective in degrading visibility, and, due to fact that they are usually acidic, can harm ecosystems and damage materials and property.)

Lead (Pb): Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. With the removal of lead-based additives from gasoline, the primary source of lead emissions is now smelting and processing of the metal. Airborne lead may settle and become a toxic exposure concern in soil, especially where children play and get soil on their hands. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood-forming processes in the body.

Vinyl Chloride (VC): Vinyl chloride is a chemical building block, or monomer, used in the production of polyvinyl chloride (PVC). PVC is used to make materials, including pipes, used in the construction, packaging, electrical and transportation industries. Major sources of VC include PVC production and fabrication facilities and, at the other end of PVC's life cycle, as PVC deteriorates, landfills and publicly-owned treatment works. VC is carcinogenic. Exposure to VC has been associated with a rare cancer, liver angiosarcoma, in workers, and with tumors of the liver, lungs, mammary glands and the nervous system in animals. The state ambient air quality standard reflects the limit of detection for VC in ambient air when the standard was promulgated, in 1978. By 1990, when state staff prepared the technical support document for identifying VC as a TAC, VC had not been detected in ambient air at any of the samplers in CARB's TAC monitoring network, although ambient hot spot sampling had detected VC at levels up to 150 percent of the standard. VC is primarily of concern as a carcinogenic TAC at hot spots. It is regulated as

a TAC to allow implementation of health-protective control measures at levels below the ambient standard.[73]

Hydrogen Sulfide: Hydrogen sulfide (H_2S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas, and can be emitted as the result of geothermal energy exploitation. Breathing H_2S at high levels a will result in exposure to a very disagreeable odor. Air agencies regulate it to protect public health and to significantly reduce odor annoyance.[74]

Visibility-reducing Particles: Visibility-reducing particles consist of suspended particulate matter, a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt. Visibility-reducing particles are regulated to limit the frequency and severity of visibility impairment due to regional haze, or to protect scenic quality.[75]

Diesel Exhaust: Although not the subject of an ambient air quality standard, the particles in diesel exhaust, which may comprise a portion of the visibility-reducing particles in ambient air, are of particular public health concern because studies have found them to be associated with carcinogenesis and other disease processes. Diesel engines emit particulate matter (DPM) and vapor. Diesel exhaust, and individual substances contained in it, can contribute to mutations in cells that can lead to cancer. At current levels of population exposure, DPM poses the highest estimated cancer risk of any TAC evaluated by California's environmental health risk assessment and risk management agencies. Diesel engines are a major source of fine particle pollution. Exposure to diesel exhaust can irritate the eyes, nose, throat and lung, and it can cause coughs and aggravate asthma. As with fine particle pollution in general, the elderly, children and those with chronic lung or heart disease are most sensitive to adverse acute and chronic health effects from DPM.

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[73] *CARB, Proposed Identification of Vinyl Chloride as a Toxic Air Contaminant. Staff Report/Executive Summary. October 1990. http://www.arb.ca.gov/toxics/id/summary/vinyl.pdf.*

[74] *http://www.arb.ca.gov/research/aaqs/caaqs/h2s/h2s.htm, accessed November 2008.*

[75] *http://www.arb.ca.gov/research/aaqs/caaqs/vrp-1/vrp-1.htm, accessed November 2008.*

b. Existing Conditions

(1) Regional Context

The project is located within the South Coast Air Basin, an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. Its terrain and geographical location determine the distinctive climate of the Basin, as the Basin is a coastal plain with connecting broad valleys and low hills.[76]

The Southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes.[77] The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds[78] — dry, warm, often hot, blustery winds that blow from the desert into the Basin and towards the sea.[79] The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Basin,[80] making it an area of high pollution potential.[81]

The greatest air pollution impacts throughout the Basin occur from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season, and time of day. Ozone concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far

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[76] *SCAQMD, CEQA Air Quality Handbook (April 1993), p. A8-1.*

[77] *Ibid., p. A8-1.*

[78] *SCAQMD, CEQA Air Quality Handbook (April 1993), p. A8-1.*

[79] *Robert Fovell, "The Santa Ana Winds FAQ," http://www.atmos.ucla.edu/~fovell/ASother/mm5/SantaAna/-santa_ana_faq.html; www.atmos.ucla.edu/~fovell/ASother/mm5/SantaAna/winds.html (accessed Aug. 2008).*

[80] *Cerritos General Plan EIR (final: January 6, 2004), http://www.rbfconsulting.com/us/cerritos/-General_plan_final/Section04-05.AirQuality.pdf (accessed July 2008), p. 4.5-1.*

[81] *See Ralph W. Keith, Senior Meteorologist, SCAQMD,"A Climatological/Air Quality Profile: California South Coast Air Basin" (Nov. 1980), pp. 87-95.*

inland areas of the Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in Southern California.[82] With regard to ambient air quality standards, the Basin remains in nonattainment status for ozone, PM_{10} and $PM_{2.5,}$ however.

The SCAQMD has released the final report of the third round of its Basin-wide Multiple Air Toxics Exposure Study (MATES III).[83] MATES III represents one of the most comprehensive air toxics studies ever conducted in an urban environment. The study was aimed at estimating the cancer risk from toxic air emissions throughout the Basin by conducting a comprehensive monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to characterize health risks in the Basin. MATES III focused on carcinogenic risk from air toxics, and did not estimate other health effects from particulate exposures. Based on average measurements at ten fixed monitoring sites, the study estimated 70-year lifetime carcinogenic risk from air pollution in the Basin to be approximately 1,200 in one million. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 84 percent of the overall risk was attributed to diesel particulate emissions, approximately 10 percent to other toxics associated with mobile sources (including benzene, butadiene, and formaldehyde), and approximately six percent to stationary sources (which include industries and other certain businesses, such as dry cleaners and chrome plating operations).[84]

As part of MATES III, the SCAQMD has prepared an interactive map[85] that shows estimated inhalation cancer risks in the Basin from ambient levels of air toxics, as part of an ongoing effort to provide insight into relative risks. When accessed via the Internet, the map displays estimated risks for discrete two-kilometer-by-two-kilometer grid cells. The map's estimates assume 70-year lifetime exposure to the annual average levels estimated by the MATES III model.[86] Figure IV.B-1 on page IV.B-26 shows two annotated screen captures from the map: (a) an overview showing much of the urbanized area of central and south Los Angeles County, with the grid cell containing the project location highlighted, and (b) a close-up showing two adjacent grid cells and the project location. Figure IV.B-1(a) shows that the project is in a grid cell with an estimated risk of from 501 to 1,200 in one

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[82] *See SCAQMD, "1996 Air Quality and Trends," p. 1; "2002 Air Quality and Trends," p. 6; and other reports available at http://www.aqmd.gov/smog/AIrQualitybyYear.htm.*

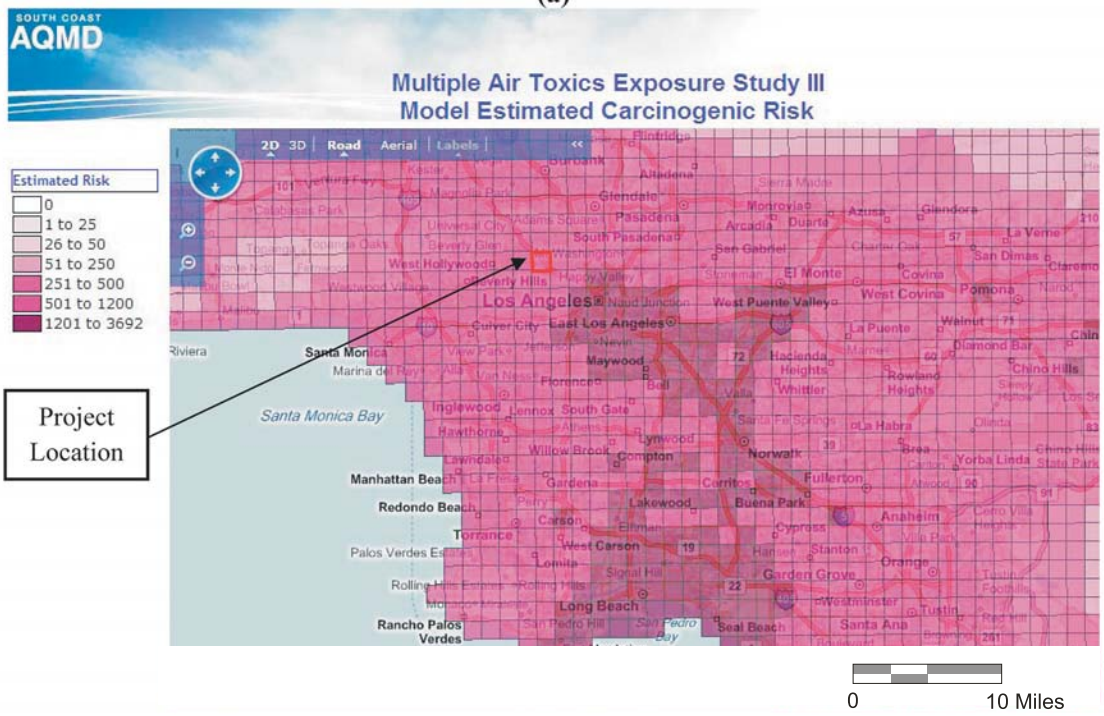
[83] *http://aqmd.gov/prdas/matesIII/MATESIIIFinalReportSept2008.html, accessed November 2008.*

[84] *SCAQMD, MATES-III Final Report, Executive Summary, http://aqmd.gov/prdas/matesIII/Final/Document/ab-MATESIIIExecutiveSummary-Final92008.pdf, accessed November 2008.*

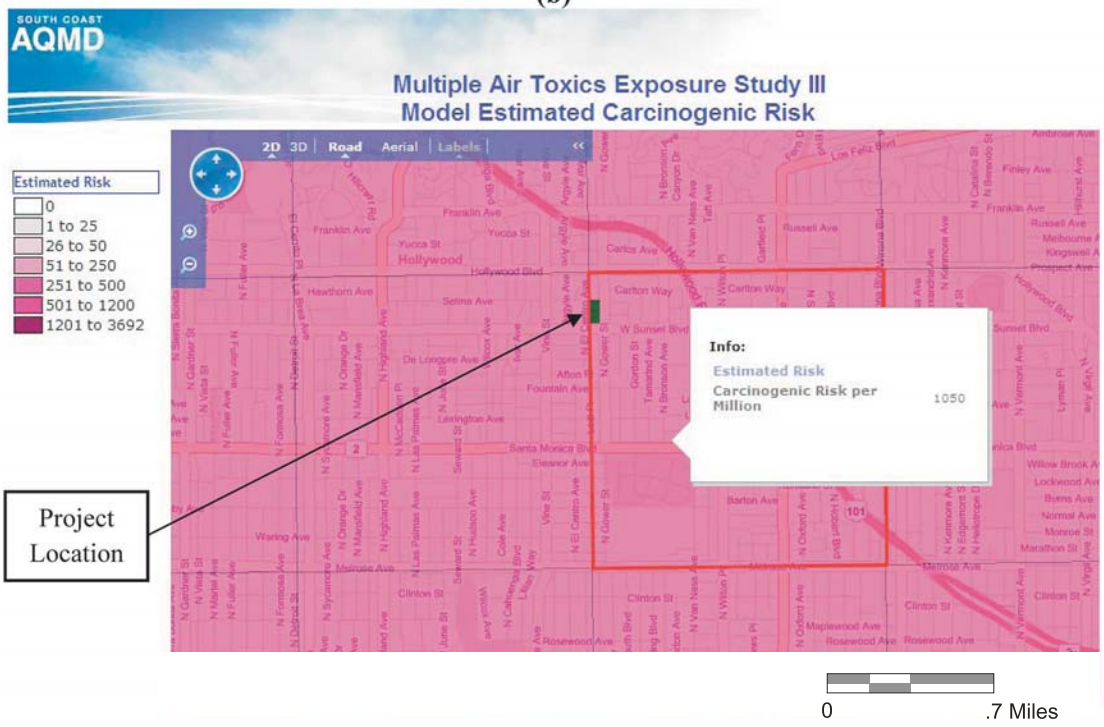
[85] *http://www.aqmd.gov/webappl/matesiii, accessed November 2008.*

[86] *http://www.aqmd.gov/prdas/matesIII/risk.html, accessed November 2008.*

(a)



(b)



Columbia Square

matrix environmental

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Figure IV.B-1
MATES III
Risk Estimate Maps

Source: SCAQMD, 2008

million, and is northwest of a portion of the area (which contains central Los Angeles and Long Beach, and is shown in a darker color) that is estimated to have the highest air toxics cancer risks. Figure IV.B-1(b) shows that the project is located near the northwest corner of a grid cell that, as indicated by a pop-up information box, has an estimated carcinogenic risk of 1,050 per million. In general, the MATES III data and map indicate that an increased cancer risk is associated with living in urbanized areas of the region, especially near congested highways, and that mobile sources represent the greatest contributors to the overall risk.

(2) Local Area Conditions

(a) Existing Pollutant Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Basin and has divided the Basin into air monitoring areas or source receptor areas. The project site is located in the Central Los Angeles County Monitoring Area. The monitoring station for this area is the Central Los Angeles, which is located at 1630 North Main Street, approximately six miles east-southeast of the project site. Of the criteria pollutants, O_3, CO, $PM_{2.5}$, PM_{10}, SO_2, and NO_2, are monitored at this station. The most recent annual data available from this monitoring station are from 2007. The data for the years 2002 to 2007 (see Table IV.B-3 on page IV.B-28) show the following for each pollutant:

Ozone: The maximum 1-hour O_3 concentration recorded at the SRA 1 monitoring station during the 2002-2007 period was 0.152 parts per million (ppm), recorded in 2003. During this period, the California standard was exceeded on between two and 11 days annually and the national standard was exceeded on between zero and two days. The maximum 8-hour O_3 concentration was 0.102 ppm, recorded during 2007. California established an 8-hour ozone standard of 0.070 ppm in 2006. The SRA 1 monitor found ozone above that level on between two and seven days annually from 2004 to 2007, the only years for which 8-hour O_3 data are available. The national standard was exceeded between zero and two times annually.

Respirable Particulate Matter (PM_{10}): The highest average 24-hour PM_{10} concentration was 92 $\mu g/m^3$, recorded in 2006. During the years 2002-2007, between 5.1 and 14.5 percent of the air samples taken at the SRA 1 monitoring station (representing between 18 and 48 days, as samples were collected every 6 days) showed (6-day average) concentrations above the California 24-hour average standard for PM_{10}. No sample showed an exceedance of the corresponding national standard. The maximum annual arithmetic mean was 39.3 $\mu g/m^3$, in 2002. The annual average PM_{10} concentration was above the California standard, but not the national standard, every year.

Table IV.B-3
Pollutant Standards and Ambient Air Quality Data
from Representative Monitoring Stations

Pollutant Standard and Data	2002	2003	2004	2005	2006	2007
Ozone						
1-Hour: C=0.09 ppm; N=0.12 ppm [a]						
Max. Concentration (ppm)	0.122	0.152	0.110	0.121	0.110	0.115
Days > California Standard	8	11	7	2	8	3
Days > National Standard [a]	0	1	0	0	0	0
8-Hour: C=0.070 ppm; N=0.08 ppm [b]						
Max. Concentration (ppm)	0.080	0.088	0.092	0.098	0.079	0.102
4th Highest 8-hour Conc. (ppm)	0.079	0.083	0.079	0.072	0.077	0.072
Days > California Standard [c]	--	--	7	2	4	6
Days > National Standard [b]	0	2	1	1	0	2
Particulate Matter (PM_{10})						
24-Hour: C=50 μg/m³; N=150 μg/m³ [d]						
Max. Concentration (μg/m³)	65	81	72	70	92	78
% of Samples [e] > Calif. Standard	14.5	9.8	8.2	6.6	5.1	9
% of Samples [e] > National Standard	0	0	0	0	0	0
Annual: C=20 μg/m³; N=50 μg/m³ [f]						
Annual Arithmetic Mean (μg/m³)	39.3	34.6	32.7	29.6	30.3	33.3
> California Standard?	Yes	Yes	Yes	Yes	Yes	Yes
> National Standard?	No	No	No	No	No	No
Particulate Matter ($PM_{2.5}$)						
24-Hour: N=65 or 35 μg/m³ [g]						
Max. 24-hour Concentration (μg/m³)	66.3	83.7	75	73.7	56.2	64.2
% of Samples [h] > National Standard [g]	0.3	1.5	0.6	0.6	3	0.6
Annual: C=12 μg/m³; N=15 μg/m³ (AAM)						
Annual Arithmetic Mean (μg/m³)	21.8	21.3	19.6	18.1	15.6	16.8
> California Standard?	Yes	Yes	Yes	Yes	Yes	Yes
> National Standard?	Yes	Yes	Yes	Yes	Yes	Yes
Carbon Monoxide						
1-Hour: C=20 ppm; N=35 ppm						
Max. Concentration (ppm)	5	6	4	4	3	3
Days > California Standard	0	0	0	0	0	0
Days > National Standard	0	0	0	0	0	0
8-Hour: C=9 ppm [i]; N=9 ppm						
Max. Concentration (ppm)	4.0	4.6	3.2	3.1	2.6	2.2
Days > California Standard [i]	0	0	0	0	0	0
Days > National Standard	0	0	0	0	0	0
Nitrogen Dioxide						
1-Hour: C=0.25 ppm						
Max. Concentration (ppm)	0.14	0.16	0.16	0.13	0.11	0.10
Days ≥ California Standard	0	0	0	0	0	0
Annual: C=0.053 ppm						
Annual Arithmetic Mean (ppm)	0.0327	0.0338	0.0328	0.0278	0.0288	0.0299
≥ California Standard?	No	No	No	No	No	No

Table IV.B-3 (Continued)
Pollutant Standards and Ambient Air Quality Data
from Representative Monitoring Stations

Pollutant Standard and Data	2002	2003	2004	2005	2006	2007
Sulfur Dioxide[j]						
1-Hour: C=0.25 ppm						
Max. Concentration (ppm)	0.02	0.05	0.08	0.07	0.03	0.01
Days > California Standard	0	0	0	0	0	0
24-Hour: C=0.04 ppm; N=0.14 ppm[k]						
Max. Concentration (ppm)	0.016	0.006	0.015	0.010	0.006	0.003
Days > California Standard	0	0	0	0	0	0
Days > National Standard	0	0	0	0	0	0
Annual: N=0.03 ppm						
Annual Arithmetic Mean (ppm)	--	--	--	--	0.0019	0.0009
> National Standard?	N/A	N/A	N/A	N/A	No	No
Lead						
30-Day (Monthly): C=1.5 $\mu g/m^3$						
Max. 30-Day Average Conc. ($\mu g/m^3$)	0.05	0.15	0.03	0.02	0.02	--
% of Samples[l] > Calif. Standard	0	0	0	0	0	--
Calendar Quarter: N=1.5 $\mu g/m^3$						
Max. Quarterly Avg. Conc. ($\mu g/m^3$)	0.03	0.15	0.03	0.02	0.01	--
% of Samples[l] ≥ National Standard	0	0	0	0	0	--
Sulfate						
24-hour: C=25 $\mu g/m^3$						
Max. 24-hour Concentration ($\mu g/m^3$)	15.2	14.6	12.7	14.2	18.2	--
% of Samples[l] > Calif. Standard	0	0	0	0	0	--

C = California ambient air quality standard; N = national ambient air quality standard; ppm = parts per million; $\mu g/m^3$ = micrograms per cubic meter; N/A = not applicable; -- = not available or not reported.

[a] *The standard was attained when the expected number of days per calendar year with maximum hourly average concentrations above 0.12 ppm was ≥ 1. As of June 15, 2005, the USEPA revoked the 1-hour ozone standard in all areas except certain areas outside of California.*

[b] *To attain this national standard, the 3-year average of the 4th-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year had to be ≤ 0.08 ppm. Effective May 27, 2008, that value became 0.075 ppm, although the 0.08 ppm standard has remained in effect during transition.*

[c] *The California 8-hour standard for ozone went into effect in 2006.*

[d] *May be exceeded once per year on average over 3 years.*

[e] *At this monitoring station, PM_{10} samples were collected every six days; each reflects a six-day period.*

[f] *The USEPA revoked the national annual PM10 standard, effective December 17, 2006.*

[g] *In September 2006, the 24-hr $PM_{2.5}$ standard was changed from 65 $\mu g/m^3$ to 35 $\mu g/m^3$. The exceedance data shown here for 2002-2005 relate to the old standard. The 2006 exceedance percentage relates to the new standard.*

[h] *At this monitoring station, $PM_{2.5}$ samples were collected every day.*

[i] *A different 8-hour California CO standard applies in the Lake Tahoe Air Basin.*

[j] *There is a secondary national ambient air quality standard for SO_2 (0.5 ppm, 3-hour average) that is not listed in this table. Secondary standards are for protecting resources other than human health. SO_2 is the only substance for which a secondary standard is different than the primary standard. California does not have the two separate types of ambient air quality standard.*

[k] *May be exceeded once per year.*

[l] *Samples were collected every six days; each reflects a six-day period.*

Source: South Coast Air Quality Management District, Air Quality Data Tables (http://aqmd.gov/smog/historicaldata.htm); California Air Resources Board.

Fine Particulate Matter ($PM_{2.5}$): The highest 24-hour $PM_{2.5}$ concentration recorded was 83.7 µg/m^3, in 2003. Between 0.3 and 3 percent of the air samples (representing between 1 and 11 days, as samples were collected every day) showed concentrations above the year's most stringent national 24-hour average standard for $PM_{2.5}$. (The USEPA lowered the standard from 65 µg/m^3 to 35 µg/m^3 in 2006.) The maximum annual arithmetic mean was 21.8 µg/m^3, in 2002. The annual average $PM_{2.5}$ concentration was above the California standard and the national standard every year.

Carbon Monoxide: The highest 1-hour CO concentration recorded in 2002-2007 was 6 ppm, in 2003. The maximum 8-hour CO concentration was 4.6 ppm, also recorded during 2003. There were no exceedances of the California or national 1-hour or 8-hour CO standards.

Nitrogen Dioxide: The highest 1-hour NO_2 concentration was 0.16 ppm, recorded both in 2003 and in 2004. The highest annual arithmetic mean was 0.0338 ppm, in 2003. There were no exceedances of the California or national standards.

Sulfur Dioxide: The highest 1-hour concentration of SO_2 was 0.08 ppm, recorded in 2004. The maximum 24-hour concentration was 0.016 ppm, recorded in 2002. The arithmetic annual average concentration was 0.0019 ppm in 2006 and 0.0009 ppm in 2007, the only years for which annual averages are available. There were no exceedances of California or national standards.

Lead: The highest 30-day and calendar quarter concentrations of lead in 2002-2006[87] were both 0.15 µg/m^3, one-tenth of the standard, and recorded in 2003. In other years, those concentrations reached no more than one-fifth that level, or one-fiftieth of the standard. The South Coast Air Basin is currently in compliance with California and national standards for lead, and monitoring for lead is not conducted at all stations. The primary sources of atmospheric lead, leaded gasoline and lead-based paint, are no longer commercially available in the Basin due to regulations.

Sulfates: Samples were collected every 6 days. The highest (6-day average) 24-hour NO_2 concentration in 2002-2006[88] was 18.2 µg/m^3, recorded in 2006. There were no exceedances of the California standard.

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[87] *As of this writing, "Due to technical difficulties," lead data for 2007 were not yet available. SCAQMD, 2007 Air Quality: http://www.aqmd.gov/smog/AQSCR2007/aq07card.pdf, accessed July 2008.*

[88] *As of this writing, "Due to technical difficulties," sulfate data for 2007 were not yet available. SCAQMD, 2007 Air Quality: http://www.aqmd.gov/smog/AQSCR2007/aq07card.pdf, accessed July 2008.*

(b) Existing Health Risk in the Surrounding Area

As shown in Figure IV.B-1, the project site is located within an estimated ambient air toxics cancer risk zone of 501 to 1,200 in one million, in a map grid cell with an estimated risk of 1050 per million.[89] However, the risk estimate grid resolution available in the map is 2 kilometers by 2 kilometers and impacts from individual facilities for individual neighborhoods are not discernable on this map. In general, as shown in the SCAQMD MATES III map provided in Figure IV.B-1, the ambient air toxics cancer risk at the project site is comparable to that experienced by other inland areas in Los Angeles.

(c) Sensitive Receptors and Locations

Some population groups, referred to as sensitive receptors, including children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to air pollution than others. Sensitive land uses are those most frequently used by sensitive receptors, including homes, schools, hospitals and care facilities. Sensitive land uses in the project vicinity are shown in Figure IV.B-2 on page IV.B-32 and include mainly residential uses. The closest sensitive receptors are the proposed residential uses located across El Centro Avenue, approximately 70 feet west of the project site (immediately north of the Hollywood Palladium). Other close receptors include residences located across Gower Street, approximately 80 feet east of the project site, north of Harold Way. Additional residences are located further to the east of the project site along Harold Way and Selma Avenue.

c. Project Design Features

(1) Construction

(a) Fugitive Dust

During construction, the project would comply with SCAQMD Rule 403 which requires implementation of best available dust control measures during construction activities which generate fugitive dust, such as earth-moving activities, grading, demolition and equipment travel on unpaved roads. Dust control measures include frequent application of water or chemical surfactants, providing dirt track-out prevention devices, covering stockpiles and sweeping of streets adjacent to the construction site. The full text of SCAQMD Rule 403 is included in Appendix B of this EIR.

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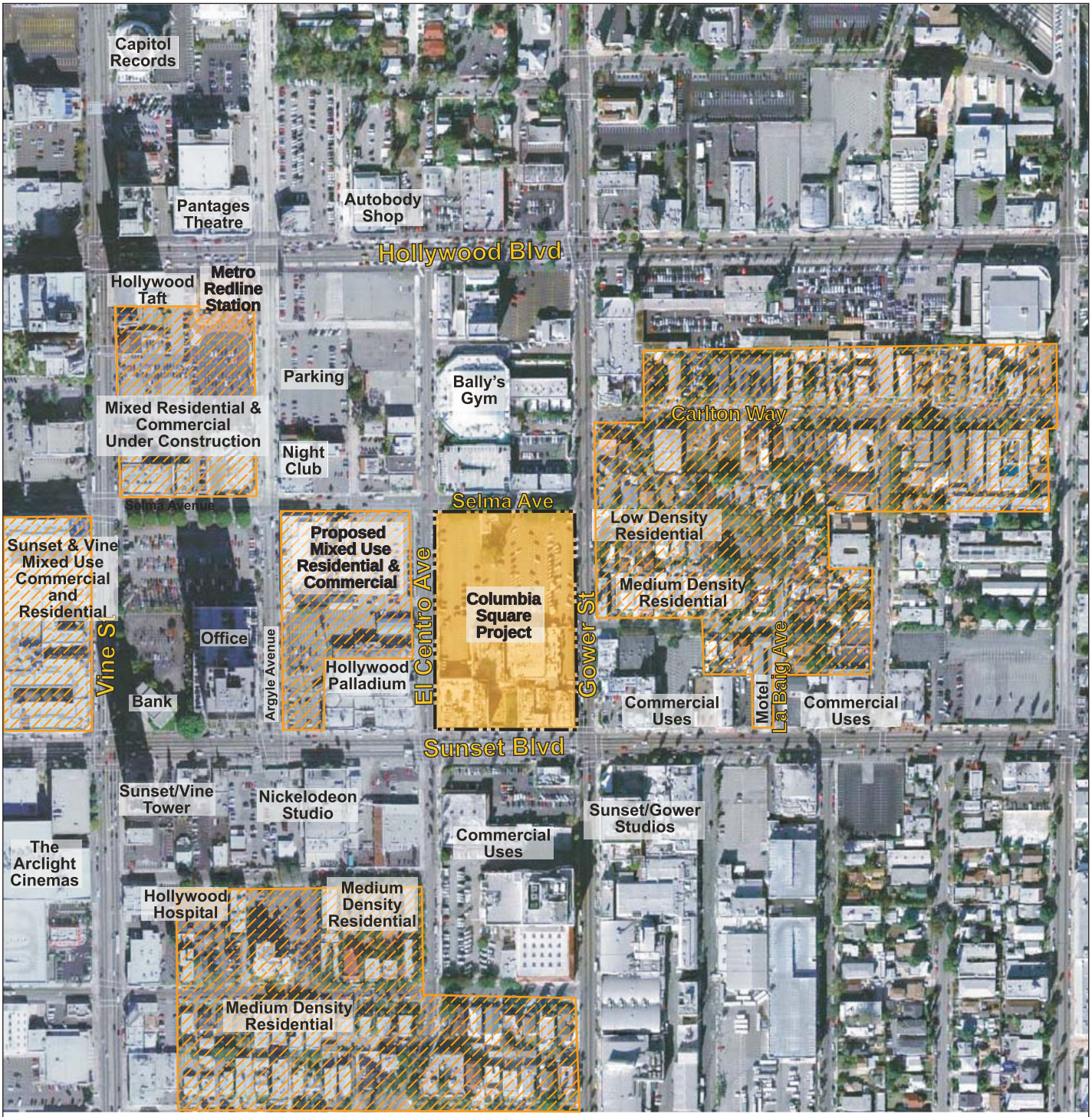
[89] *SCAQMD.*



LEGEND

Air Quality Sensitive Receptors

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0 400 800 Feet

Columbia Square

matrix environmental

Figure IV.B-2
Air Quality Sensitive Receptor Locations

Source: Google Earth Pro 2006; Sanborn 2006; and Matrix Environmental 2008

(b) Idling

Project contractors would comply with CARB's Airborne Toxic Control Measure (ATCM), adopted in 2004, which limits heavy duty diesel engines from idling for more than 5 minutes at any given time. ATCM applies to diesel powered vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered, and would thus apply to the heavy duty diesel vehicles idling at the project site.

The Project Applicant shall schedule deliveries during off-peak traffic periods to encourage the reduction of trips during the most congested periods.

(2) Operation

(a) Odor Management

The project would implement good housekeeping practices (e.g., maintenance and inspections of ventilation hood systems, grease interceptors, etc) to minimize the release of odors from restaurant uses with odor reducing equipment as necessary. In addition, garbage collection areas for the project would be covered and situated away from the property line and sensitive uses. Good housekeeping practices would be sufficient to prevent nuisance odors.

(b) Sustainability Design Features

- The project would be designed and constructed in a manner consistent with the requirements needed to achieve a Silver rating from the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED® program. The following project design features would be implemented to achieve a LEED® Silver rating, all of which directly or indirectly result in lower emissions of criteria pollutants, toxic air contaminants, or GHGs than "business as usual":

<u>Energy</u>

- Exceed Title 24 (2007 California Building Standards Code) baseline standard requirements for energy efficiency by 14 percent through such design methods and technologies as centralized chiller plant with rooftop ventilation, high performance glazing on windows, solar hot water generation, appropriately-oriented shading devices, high efficiency boilers, cogeneration, and enhanced insulation to minimize solar and thermal gain. These design features would

reduce the project's heating and cooling loads, thus reducing the greenhouse gas emissions associated with necessary energy inputs.

- Apply energy-saving technologies and components to reduce the project's electrical use-profile. Examples of these components include compact fluorescent light bulbs (CFL), energy saving lighting schemes such as motion-detection controls (where applicable), and energy efficient heating and cooling equipment.

- Commissioning of building energy systems to verify that the project's buildings energy systems are installed, calibrated, and performed to the Applicants' project requirements.

- A central electronic metering network and sub-metering capability will be included in the base building design. Future tenants will be able to utilize this resource to creating their own metering and verification system.

- Each component of the project would incorporate strategies to mitigate the heat island effect.[90] The project would install roofing materials with cool roof membranes in accordance with LEED® requirements. The project would also integrate non-roof strategies by placing 100 percent of parking spaces underground. By mitigating the heat island effect around the project site, the project would lower its air conditioning demand, and thus its peak energy usage.

Air Quality

- Participation in fundamental refrigerant management to preclude the use of chlorofluorocarbons (CFCs) in HVAC systems for the project's residential and hotel uses.

- Use of adhesives, sealants, paints, finishes, carpet, and other materials that emit low quantities of volatile organic compounds (VOCs) and/or other air quality pollutants.

[90] *The term "heat island effect" refers to the difference in microclimate between built up and rural areas. City temperatures, as result of the heat island effect, are higher than their surrounding areas. According to the US EPA, heat islands can cause increased summertime peak energy and air conditioning demand, and thus their associated air pollutant and GHG emissions.*

Alternative Transportation Strategies

- Preparation and implementation of a Transportation Demand Management (TDM) Plan that would promote the use of alternative transportation, such as mass-transit, ride-sharing, bicycling, and walking to reduce project trips and and/or vehicle miles traveled.

- Provision of on-site bicycle storage for residents, customers, and employees.

- Allocation of preferred parking for alternative-fuel vehicles, low-emitting, and fuel-efficient and ride-sharing vehicles.

Water Conservation

- Achieve a minimum 20 percent water use reduction through water conservation measures

- Use of water conservation measures including bathroom and kitchen faucet aerators, high-efficiency clothes washers and dishwashers at a 6.0 water efficiency factor, high-efficiency toilets and waterless urinals for office, hotel, and retail/restaurant uses.

- Utilize an efficient irrigation system, including rotating sprinkler nozzles for landscape irrigation and weather sensitive landscape timers.

Waste Management

- Divert at least 75 percent of construction and demolition debris from project construction from landfills.

- Provide various locations on-site for the collection and storage of recyclable materials.

- Utilize building materials with 20 percent as recycled-content building materials for the construction of the project uses.[91]

[91] *This LEED 4.1 credit requires the use of building materials with recycled content such that the sum of post-consumer recycled content plus one-half of the pre-consumer recycled content constitutes at least 20 percent of the total value of the total building materials in the project.*

- Rehabilitate and reuse a portion of the existing buildings located on-site.

3. Project Impacts

a. Methodology

The evaluation of potential impacts to local and regional air quality that may result from the construction and long-term operations of the project was conducted as follows:

(1) Construction Impacts

(a) Regional

Construction generates pollutant emissions both on-site and off-site. The term "regional emissions" includes both. On-site emissions include soot from diesel-powered equipment, and fugitive dust generated by moving earth and driving on unpaved surfaces. Off-site emissions include diesel exhaust from construction vehicles making their way to and from the site, and vehicle exhaust from worker commuting.

Daily regional emissions during construction were forecast using a conservative[92] construction scenario (for example, assuming construction activities will occur within a short period of time, producing higher daily emissions than a prolonged schedule, and at an early date, when fewer construction fleet emission control requirements may have become effective, and fewer emission control technology innovations may have become available). URBEMIS 2007 provided the required mobile-source and fugitive dust emission factors.[93] Project design features incorporated into the construction emissions analysis include applying water to exposed surfaces at least twice daily and frequent application of water to unpaved roads, in compliance with SCAQMD Rule 403. Details, including a complete listing of construction equipment by phase and duration, and other model input assumptions used in this analysis, are presented in Appendix B of this EIR. The forecast

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[92] *The term "conservative," as used in this document, means health-conservative. In other words, in the face of the uncertainty inherent in health risk assessment, conservative methods employ models, assumptions and numerical values which are unlikely to produce estimates that understate true health risk. Methods that risk assessors consider conservative are more likely to produce heath risk estimates that are high, and thus, from a risk management perspective, to err on the side of health protection. Details are provided in Appendix B.*

[93] *URBEMIS 2007 is an emissions estimation/evaluation model developed by CARB, and based, in part, on SCAQMD CEQA Air Quality Handbook guidelines and methodologies.*

regional emission rates for construction were compared to mass daily thresholds of significance published by the SCAQMD.[94]

(b) Local

The SCAQMD has developed a set of mass emission rate look-up tables providing thresholds for use in evaluating localized impacts that may result from construction-period emissions of NO_x, CO, PM_{10} and $PM_{2.5}$.[95] The emission rate thresholds, called localized significance thresholds (LSTs), depend on the size of the project construction site, distance from the site to sensitive receptors, local meteorological conditions and, except for PM, background air quality conditions. Although use of the SCAQMD LSTs by local government is voluntary, it has become common practice.

For each pollutant, the basic procedure by which the SCAQMD prepared LSTs involved two steps, (1) establishing an air concentration or concentration change that would constitute a threshold of significance, and (2) back-calculating, using dispersion modeling, emission rates that would be expected to generate pollution levels meeting the threshold. Those emission rates, expressed in pounds per day (per 8-hour day for construction[96]), are the values given as LSTs in the LST tables. The tables present LSTs (as "Allowable emissions") by pollutant, source receptor area (SRA), size of the construction site (1 acre, 2 acres, or 5 acres), and distance from the boundary of the site to the receptor (25, 50, 100, 200, or 500 meters).[97] SCAQMD guidance for using the LSTs states, "Receptor locations include residential, commercial and industrial land use areas; and any other areas where persons can be situated for an hour or longer at a time."[98] The NO_x and CO LSTs are for receptors in general, while the district suggests that particulate matter LSTs are for

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[94] *SCAQMD Air Quality Significance Thresholds (Rev. December 2007): http://www.aqmd.gov/ceqa/handbook/signthres.pdf.*

[95] *See SCAQMD, Final Localized Significance Threshold Methodology, June 2003: http://www.aqmd.gov/ceqa/handbook/LST/Method_final.pdf and http://www.aqmd.gov/ceqa/handbook/LST/appC.pdf, accessed from http://www.aqmd.gov/ceqa/handbook/LST/LST.html. For $PM_{2.5}$, see SCAQMD, Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006: http://-www.aqmd.gov/ceqa/handbook/PM2_5/finalmeth.doc and http://www.aqmd.gov/ceqa/handbook/PM2_5/-finalAppB.doc, accessed from http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.*

[96] *SCAQMD, Final Localized Significance Threshold Methodology, June 2003: http://www.aqmd.gov/¬ceqa/-handbook/LST/Method_final.pdf, pp. 2-10, 2-11.*

[97] *SCAQMD, Final Localized Significance Threshold Methodology, June 2003, Appendix C, Localized Significance Threshold Mass Rate Look-Up Tables: http://www.aqmd.gov/ceqa/handbook/LST/appC.pdf.*

[98] *SCAQMD, Final Localized Significance Threshold Methodology, June 2003: http://www.aqmd.gov/ceqa/-handbook/LST/Method_final.pdf, p. 3-2.*

"sensitive receptor" locations — such as residences, hospitals and convalescent facilities — where an individual can remain for 24 hours, which is the shortest averaging time for particulate matter ambient air quality standards.[99]

The analysis here employed SCAQMD LSTs as follows: Localized (on-site) emission rate estimates for construction activities were derived from the regional (on- and off-site) emission rate forecasts by subtracting off-site emissions (e.g., from construction worker commuting, and from delivery and haul truck trips). The localized emission rate estimates were then compared to appropriate values in the LST tables based on project acreage and distance to receptors. The analysis used LST values specific to SCAQMD SRA 1 (Central Los Angeles County), which contains the project site. The comparison constituted an initial screen to judge the need for dispersion modeling.

Where estimated construction emissions exceeded the screening-level look-up table values, the dispersion of on-site construction emissions was modeled to estimate potential pollutant impacts at receptors for more precise evaluation. Dispersion analysis was conducted using the Industrial Source Complex (ISCST3) model, a methodology that is consistent with the procedures outlined in the SCAQMD LST methodology document.[100]

(2) Operational Impacts

The analysis of post-construction air pollution impacts considered the current use of the project site as a baseline. The difference between future (planned) operation and current use served as the basis for evaluating the significance of operational impacts of the project. In this way, the analysis focused on net impacts.

(a) Regional

The analysis of the project's likely impact on regional air quality during long-term project operations (i.e., after construction is complete) looked at three types of sources: mobile, area and stationary. Mobile sources are off-site vehicle trips. Area sources involve multiple similar emissions on-site, within the area of the project, such as when residents use natural gas for heat or cooking, or use consumer products that contain solvents. Landscaping that uses fuel-powered equipment outdoors on-site is also considered an area

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[99] *Ibid, p. 3-2. Regarding particulate matter, this portion of the SCAQMD LST guidance was written for the PM_{10} LSTs but the point applies equally to $PM_{2.5}$.*

[100] *Ibid, passim.*

source. The stationary sources considered in the analysis of regional impacts are those involved with generating electricity for the project.[101]

The URBEMIS 2007 software was used to forecast the daily regional emissions from mobile and area-sources that would occur during project operations, and also to estimate emissions associated with current uses of the site. In calculating mobile-source emissions, the URBEMIS 2007 default trip length assumptions were applied to the average daily trip (ADT) estimates from the traffic study (Appendix H) to arrive at vehicle miles traveled (VMT). Stationary source emissions were compiled using procedures outlined in the *SCAQMD's CEQA Handbook*.[102] Project design features to meet LEED® Silver certification requirements were also assumed in the modeling of baseline unmitigated emissions. Such design features incorporated into the analysis include reducing energy usage 15 percent below Title 24 baseline. The forecast regional emission rates for operation of the project were compared to mass daily thresholds of significance published by the SCAQMD.[103]

(b) Local

Operational emissions have the potential to impact local air pollutant levels at nearby receptors in two ways. New or modified on-site stationary sources, such as those fired by diesel or natural gas, may increase ambient levels of criteria pollutants at adjacent sensitive land uses. The increase in vehicular travel, especially if the project-level activity contributes substantively to an increase in congestion, may generate localized "hot spots", localized areas of elevated ambient levels, at sensitive receptors located near to roadways and intersections in the project vicinity. Analysis methods differ for each of these potential impacts and are described in detail below.

Similar to the localized construction analysis as mentioned above, the SCAQMD has developed a set of mass emission rate look-up tables providing thresholds for use in evaluating localized impacts that may result from on-site operational emissions of NO_x, CO,

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[101] *A review of the proposed project's site plan and related project description did not identify any new or modified individually significant stationary source on-site.*

[102] *See SCAQMD, CEQA Air Quality Handbook (April 1993; portions "Changed November 1993"), Chapter 9 and Appendix 9.*

[103] *SCAQMD Air Quality Significance Thresholds (Rev. December 2007): http://www.aqmd.gov/ceqa/handbook/signthres.pdf. These SCAQMD based these thresholds in part on the federal Clean Air Act, and, to enable defining "significant" for CEQA purposes, defined the setting as the South Coast Air Basin. (See SCAQMD, CEQA Air Quality Handbook, April 1993, pp. 6-1 – 6-2.)*

PM_{10} and $PM_{2.5}$.[104] The emission rate thresholds, LSTs, depend on the size of the project site, distance from the site to sensitive receptors, local meteorological conditions and, except for PM, background air quality conditions. These look-up tables were used to initially screen potential localized impacts from on-site operations and determine if further dispersion modeling is warranted. The applicable thresholds are shown in the analysis below.

The localized operational emissions analysis here employed SCAQMD LSTs in the same manner as the localized construction analysis. Localized (on-site) emission rate estimates for operational activities were derived from the regional (on- and off-site) emission rate forecasts by subtracting off-site emissions (e.g., from mobile trips). The localized emission rate estimates were then compared to appropriate values in the LST tables based on project acreage and distance to receptors. The analysis used LST values specific to SCAQMD SRA 1 (Central Los Angeles County), which contains the project site. If the emission rates are below these thresholds, there is no need for further analyses.

Where estimated operational emissions exceeded the screening-level look-up table values, the dispersion of on-site operational emissions was modeled to estimate potential pollutant impacts at receptors for more precise evaluation. Dispersion analysis was conducted using the Industrial Source Complex (ISCST3) model, a methodology that is consistent with the procedures outlined in the SCAQMD LST methodology document.[105]

With respect to mobile source emissions, CO is the primary pollutant of concern. Localized impacts from mobile source CO were evaluated using data from the traffic study (Appendix H) and the CALINE4 microscale dispersion model developed by Caltrans,[106] in combination with CARB's EMFAC2007[107] emission factors. In traffic studies, the term "level of service" (LOS) describes traffic performance at intersections or along roadway segments, and is generally expressed as a letter grade (A through F, with an A grade

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[104] *See SCAQMD, Final Localized Significance Threshold Methodology, June 2003: http://www.aqmd.gov/ceqa/handbook/LST/Method_final.pdf and http://www.aqmd.gov/ceqa/handbook/LST/appC.pdf, accessed from http://www.aqmd.gov/ceqa/handbook/LST/LST.html. For $PM_{2.5}$, see SCAQMD, Final Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006: http://-www.aqmd.gov/ceqa/handbook/PM2_5/finalmeth.doc and http://www.aqmd.gov/ceqa/handbook/PM2_5/-finalAppB.doc, accessed from http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.*

[105] *Ibid, passim.*

[106] *See California Department of Transportation, CALINE4 Manual, http://www.dot.ca.gov/hq/env/air /pages/calinemn.htm.*

[107] *See California Air Resources Board (CARB), California Environmental Protection Agency, EMFAC2007 Release, http://www.arb.ca.gov/msei/onroad/latest_version.htm.*

meaning the freest-flowing traffic). Traffic researchers and planning agencies generally assign LOS ratings to intersections based on the ratio of traffic volume (or demand) to capacity (V/C).[108] Lower V/C ratios correspond to better performance (freer-flowing traffic). SCAQMD suggests conducting a CO hotspots analysis according to a state Department of Transportation (Caltrans) protocol for any intersection where a project would worsen the LOS below C, and for any intersection rated D or worse where the project would increase the V/C ratio by 2 percent or more.[109] Projected CO concentrations were compared to ambient air quality standards and incremental increase thresholds to determine whether CO impacts from operation would be significant.

(3) Toxic Air Contaminants (TAC) Impacts (Construction and Operations)

The general procedure to evaluate potential impacts from TACs is to conduct a screening-level analysis, and to follow that with a more detailed analysis (including dispersion modeling) as necessary. The screening-level analysis consists of reviewing the project's site plan and project description to identify any new or modified TAC emissions sources. Sources of potential air toxics associated with operation of many projects include delivery trucks that emit DPM (e.g., truck traffic on local streets and on-site truck idling), boilers, charbroilers, and emergency backup generators. It was determined that dispersion modeling analysis would be required for char broilers, emergency generators and boilers located on-site.

The additional dispersion modeling analysis is conducted based on CARB and SCAQMD guidance to assess the potential health risks that nearby sensitive land uses may experience due to the proposed project's construction and/or operational activities. Cancer risk is often expressed as the maximum number of new cases of cancer projected to occur in a hypothetical population of one million people due to exposure to a specific cancer-causing substance after a 24-hour a day, 365 days a year outdoor exposure at the same concentration over a lifetime of 70 years. This probability is usually expressed in terms of the estimated number of people who will develop cancer per one million people

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[108] *For an example LOS rating system for signalized intersections, see the City of Roseville, CA, Level of Service (LOS) Policy: http://www.roseville.ca.us/pw/engineering/transportation_planning/level_of_service_(los).asp.*

[109] *See, for example, SCAQMD, Letter from Steve Smith, Ph.D., to Mr. Oscar Orci, City of Banning, re Mitigated Negative Declaration (MND) for Tentative Tract Map 34335 (Messenger Investment Company), September 7, 2007 (http://www.aqmd.gov/CEQA/igr/2007/sept/MNDBanning.pdf), Attachment p. 2, and SCAQMD, Letter from Steve Smith, Ph.D., to Mr. Richard Masyczek, City of Hemet, re Mitigated Negative Declaration (MND) for Sam's Club Conditional Use Permit 05-9: Hemet, November 22, 2005 (http://www.aqmd.gov/CEQA/igr/2005/nov/1101-02.pdf), Attachment p. 2.*

exposed. It is important to understand that this cancer risk estimate represents the probability that people develop some form of cancer. The estimated risk does not represent mortality rates. It is also important to understand that the risk described in these calculations reflects a level of exposure that would be virtually impossible to experience, and that for most individuals, exposure to a particular contaminant, such as DPM would be considerably less due to shorter duration of residence in the area, amount of time spent at the residence daily and throughout the year, and the split between time spent indoors versus outdoors.

The cancer risk from boiler, char broiler and diesel generator exhaust occurs mainly through inhalation and is typically calculated using the USEPA recommended Industrial Source Complex – Short Term (ISCST3) dispersion model. Emission factors were derived from USEPA AP-42. Output from the dispersion analysis was used to estimate the TAC concentrations. The cancer risk estimate is then calculated based on those estimated TAC concentrations using the risk methodology promulgated by the California Office of Environmental Health Hazard Assessment (OEHHA). The risk assessment guidelines established by SCAQMD and included in the following analysis are designed to produce conservative (high) estimates of the risk posed by TACs.

(4) Greenhouse Gas Emissions

Although protocols are available for calculating and reporting greenhouse gas (GHG) emissions, it is important to note that there is no clear guidance defining the extent to which direct or indirect GHG emissions resulting from a project should be addressed and analyzed as part of the CEQA assessment process. To date, no state agency has promulgated significance criteria for such emissions. Nevertheless, this EIR endeavors to characterize the majority of the GHG emissions that would be associated with the project by considering likely increases in use of on-road motor vehicles (mobile sources), electricity, water and natural gas.

The California Climate Action Registry (CCAR)[110] has prepared a protocol for calculating and reporting GHG emissions from a number of general and industry-specific

[110] *CCAR was "a public/private partnership created by the State of California to encourage ... government agencies and ... organizations that do business in California to voluntarily measure and report their [GHG] emissions." State of California. California Climate Action Registry. (http://www.climatechange.ca.gov/-publications/factsheets/2005-06_CLIMATE_ACTION_REGISTRY_FS.PDF, accessed Aug. 2008.) The law establishing CCAR (Health and Safety Code §§ 42820 et seq.) sunset as of Jan. 1, 2008, but CCAR continues as "a private non-profit organization originally formed by the State of California," serving as "a voluntary ... registry to protect and promote early actions to reduce GHG emissions by organizations." (http://www.climateregistry.org/about.html, accessed Aug. 2008.)*

activities.[111] This guidance was used to address GHG emissions from the project. To be consistent with guidance from the SCAQMD for calculating criteria pollutants from construction activities, GHG emissions from on-site demolition and construction activities and off-site hauling and construction worker commuting are considered as project-generated. The GHG emissions resulting from the incremental increase in usage of on-road mobile vehicles, electricity, and natural gas after construction of the project were also considered as project-related. Finally, since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions were calculated on an annual basis.

With regard to mobile sources, the analysis used estimates from the traffic study (Appendix H) of vehicle miles traveled (VMT) that would be generated by the project. In order to calculate annual GHG emissions, daily vehicle miles were converted to annual vehicle miles traveled (annualized) using the URBEMIS 2007 software. These values account for variations in trip frequency and length associated with travel to and from the project location. Mobile source calculations also utilized EMFAC2007 to derive emission factors for CO_2 and methane (CH_4). These emission factors were then applied to the annual VMT from the traffic study. Future mobile source GHG emission reductions from regulations required by AB 1493 were not incorporated in EMFAC2007. Therefore, the analysis may have produced an overestimate of future mobile source GHG emissions.

The consumption of fossil fuels to generate electricity and to provide heating and water creates GHG emissions. Future fuel consumption rates were estimated based on land use-specific square footage of the project, and natural gas and electricity usage factors derived from the SCAQMD *CEQA Air Quality Handbook.*[112] GHG emission factors from the most recent CCAR General Reporting Protocol[113] were then applied to the fuel consumption rates to calculate annual greenhouse gas emissions.

Embodied energy usage rates associated with the project's future water supply needs were estimated using energy intensity factors provided by the CEC.[114] GHG

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[111] *CCAR, General Reporting Protocol Version 3.0 (April 2008), http://www.climateregistry.org/resources/-docs/protocols/grp/GRP_V3_April2008_FINAL.pdf.*

[112] *See SCAQMD, CEQA Air Quality Handbook (April 1993; portions "Changed November 1993"), Chapter 9 and Appendix 9.*

[113] *CCAR, General Reporting Protocol Version 3.0 (April 2008), http://www.climateregistry.org/resources/-docs/protocols/grp/GRP_V3_April2008_FINAL.pdf.*

[114] *CEC, California's Water-Energy Relationship (Nov. 2005), http://www.energy.ca.gov/2005publications/CEC-700-2005-011/CEC-700-2005-011-SF.PDF (accessed Aug. 2008), p. 11. In the analysis here, the energy required for wastewater treatment is considered separately from the energy intensity of the other parts of the water use cycle (water supply and conveyance, water treatment and water distribution). Recycling wastewater reduces energy demand and hence GHG emissions as well.*

emission factors from the CCAR protocol were then applied to the energy usage rates to calculate water use-related annual greenhouse gas emissions in metric tons.

It is difficult to identify the specific generating source or sources of electricity for the project. The Los Angeles Department of Water and Power (DWP) produces power at City-operated plants and also imports power during peak demand periods. The GHG emission factors used in this analysis represent a statewide average of known power producing facilities, that use various technologies and emission control strategies, and do not take into account the DWP's unique emissions profile. Nor do they reflect future reductions in electricity generation GHG emissions required or likely to be prompted by SB 1368 or the *LA Green Plan*.[115] Therefore, these emission factors are considered conservative.

Not all GHGs exhibit the same ability to induce climate change. As a result, GHG contributions are commonly quantified in terms of what would be, in global warming potential (GWP), an equivalent mass of CO_2, denoted as CO_2e. Mass emissions are calculated by converting pollutant specific emissions to CO_2e emissions by applying the proper global warming potential (GWP) value.[116] These GWP ratios are available from the USEPA and published in the CCAR protocol. By applying the GWP ratios, project related CO_2e emissions can be tabulated in metric tons per year. The CO_2e values were calculated for all four construction years as well as existing and project build-out conditions in order to estimate the net change in GHG emissions for construction and operation (refer to Appendix B of this EIR).

(5) Odor Impacts (Construction and Operations)

The general procedure to evaluate potential odor impacts is to conduct a screening-level analysis and to follow that with a more detailed analysis (including dispersion modeling) as necessary. The screening-level analysis consists of reviewing the project's site plan and project description to identify any new or modified noxious odor sources. If it is determined that the project would introduce a new odor source, or modify an existing odor source, then downwind sensitive receptor locations are identified and site-specific dispersion modeling is conducted to determine project impacts.

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[115] *See Sec. 2a(7) above, on the regulatory framework related to global climate change.*

[116] *CO_2e was developed by the Intergovernmental Panel on Climate Change (IPCC), and published in its Second Assessment Report (SAR) 1996.*

b. Significance Thresholds

(1) Construction Emissions

The *City of L.A. CEQA Thresholds Guide (2006)* lists factors for consideration on a case-by-case basis in evaluating the significance of air quality impacts from construction.[117] URBEMIS 2007 (or similar) analyses of construction emissions generally incorporate those factors. While these factors are important inputs in determining the amounts and nature of air pollution emissions generated by a project during construction, the *City of L.A. CEQA Thresholds Guide (2006)* does not include thresholds to which resultant emission estimates may be compared for purposes of determining significance. As stated in the *City of L.A. CEQA Thresholds Guide (2006)*, the City has not adopted specific citywide significance thresholds for air quality impacts. However, because of the SCAQMD's regulatory role in the air basin, the City references the criteria, thresholds, and analysis methodologies in the SCAQMD's Handbook. Based on criteria set forth in the SCAQMD Handbook, the project would have a significant impact with regard to construction emissions if any of the following would occur:[118]

- Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 100 pounds per day for NO_X, (2) 75 pounds a day for VOC, (3) 150 pounds per day for PM_{10}, (4) 55 pounds per day for $PM_{2.5}$ (5) 150 pounds per day for SO_X, and (6) 550 pounds per day for CO.

In addition, the SCAQMD has published tables that to help determine whether localized (on-site) construction emissions would cause significant impacts. Impacts may be considered significant if maximum daily localized emissions (emissions from the site) of CO, NO_2, PM_{10} or $PM_{2.5}$, would be greater than the relevant mass emission rates provided

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[117] *See page B.1-3 of the guide (http://www.cityofla.org/EAD/EADWeb-AQD/Thresholds/B-Air Quality.pdf, 2006, accessed Aug. 2008).*

[118] *See SCAQMD, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), 1993 and SCAQMD, SCAQMD Air Quality Significance Thresholds (Rev. December 2007): http://www.aqmd.gov/ceqa/handbook/signthres.pdf. The $PM_{2.5}$ threshold was added after the City of L.A. CEQA Thresholds Guide was prepared. The SCAQMD has also published a screening table using project type and per quarter figures for square footage of gross floor area constructed, vehicle miles traveled, acres graded, or cubic feet of building demolished, as another tool for determining when a project's construction emissions could be significant. (See SCAQMD, CEQA Air Quality Handbook, April 1993, pp. 6-4 [Changed Nov. 1993] and 6-12.)*

by source receptor area (SRA), project acreage and distance to receptors in the SCAQMD's Localized Significance Threshold (LST) lookup tables.[119]

(2) Operational Emissions

Thresholds of significance regarding operational emissions are set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, which states that a project would normally have a significant impact on air quality from project operations if any of the following would occur:

- Regional operational emissions exceed any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day (10 tons per year) for VOC, (2) 55 pounds per day for NO_X, (3) 150 pounds per day for PM_{10}, (4) 55 pounds per day for $PM_{2.5}$, (4) 150 pounds per day for SO_X, or (5) 550 pounds per day for CO.[120]

- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:

  - The project causes or contributes to an exceedance of the California 1-hour CO standard of 20 parts per million (ppm) or the 8-hour standard of 9.0 ppm; or

  - The incremental increase in CO concentration due to the project is equal to or greater than 1.0 ppm 1-hour average, or 0.45 ppm 8-hour average.[121]

- The project creates an objectionable odor at the nearest sensitive receptor.

In addition to the above criteria established by the City for localized emissions (emissions from the project site), the SCAQMD has also, as part of its guidance for determining the air quality significance of a project, listed additional indicators for use as screening criteria indicating the need for further analysis of operations. These include whether a project could:

- Cause an increase in the frequency or severity of existing air quality violations;

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[119] *The LSTs tables are referenced above, under Methodology.*

[120] *SCAQMD, CEQA Air Quality Handbook, April 1993*

[121] *City of L.A. CEQA Thresholds Guide (2006): http://www.cityofla.org/EAD/EADWeb-AQD/Thresholds/3-Introduction.pdf*

- Cause or contribute to new air quality violations;
- Delay timely attainment of air quality standards; or
- Result in population increases within the regional statistical area which would be in excess of that projected in the SCAQMD's Air Quality Management Plan (AQMP) and in other than planned locations for the project's build-out year.

Similar to the localized construction analysis as discussed above, the SCAQMD has published tables that to help determine whether localized (on-site) operational emissions would cause significant impacts. Impacts may be considered less than significant if maximum daily localized emissions (emissions from the site) of CO, NO_2, PM_{10} or $PM_{2.5}$, would be less than the relevant mass emission rates provided in the SCAQMD's LST lookup tables.[122] If emissions are greater than the LSTs, dispersion modeling must be used to determine quantitatively if ambient levels would exceed the applicable AAQS in accordance with the criteria listed above.

In general, operation of a project would have a significant impact if it would conflict with an adopted AQMP. In addition, a project would likely have a significant impact, but would be ineligible for a building permit, if it is subject to the City of Los Angeles' green building ordinance without meeting the ordinance's criteria.

(3) Toxic Air Contaminants

Regarding TACs, the *City of L.A. CEQA Thresholds Guide (2006)* sets forth the following factors for consideration on a case-by-case basis in making a determination of significance:

- The regulatory framework for the toxic material(s) and process(es) involved;
- The proximity of the toxic air contaminants to sensitive receptors;
- The quantity, volume and toxicity of the contaminants expected to be emitted;
- The likelihood and potential level of exposure; and

[122] *The LSTs tables are referenced above, under Methodology.*

- The degree to which project design will reduce the risk of exposure.

Based on these factors and SCAQMD Rule 1401 (New Source Review of Toxic Air Contaminants), a project may be found to have a significant TAC impact if on-site stationary sources would emit carcinogenic or toxic air contaminants in amounts that would cause an increase in maximum individual cancer risk exceeding either:

- one in one million (1×10^{-6}) if the best available control technology for toxics (T-BACT) is not used; or
- ten in one million (10×10^{-6}) if T-BACT is used (the higher threshold recognizes the use of technology to control emissions).

Similarly, a project may be found to have a significant TAC impact if emissions from on-site stationary sources would cause a cumulative increase in an acute or chronic hazard index for any organ system exceeding 1.0 or an alternate level deemed to be safe.[123] SCAQMD guidance for determining the air quality significance of a project lists additional indicators for use as screening criteria indicating the need for further analysis of potential TAC emissions from operations. These include whether a project:

- Will have hazardous materials associated with on-site stationary sources and could result in an accidental release of TACs or acutely hazardous materials posing a threat to public health and safety;
- Could involve burning of hazardous, medical, or municipal waste as a waste-to-energy facility; or
- Could be occupied primarily by sensitive receptors near a CO hot spot, or within a quarter mile of a facility that emits air toxics identified in SCAQMD Rule 1401.[124]

(4) Greenhouse Gas Emissions

The CEQA Guidelines, Section 15064.7, define a threshold of significance as an identifiable quantitative, qualitative or performance level of a particular environmental

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[123] *See SCAQMD Risk Assessment Procedures for Rules 1401 and 212, Version 7.0 (July 2005), available from http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html.*

[124] *SCAQMD, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), April 1993, p. 6-3.*

effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant. CEQA gives wide latitude to lead agencies in determining what impacts are significant and does not prescribe thresholds of significance, analytical methodologies, or specific mitigation measures. CEQA leaves the determination of significance to the reasonable discretion of the lead agency and encourages lead agencies to develop and publish thresholds of significance to use in determining the significance of environmental effects. However, neither the SCAQMD, the air pollution control agency for all of Orange County and the urban portions of Los Angeles, Riverside and San Bernardino counties, nor the City of Los Angeles, the lead agency for the project, have yet established significance thresholds for GHG emissions. The regulations required to meet the State goals under AB 32 are still under development. Furthermore, pursuant to SB 97, guidelines to be prepared by OPR for addressing greenhouse gas emissions under CEQA will not be adopted until January 1, 2010. Accordingly, at this time there is no formal guidance under CEQA and no available quantitative standards by which the approval of a real estate development project can be judged to support or hinder attainment of the State's goals relating to GHG abatement.

While the OPR has not yet adopted formal CEQA Guidelines for analyzing GHG emissions, OPR's Technical Advisory discussed above, suggests three components for CEQA disclosure: quantification of GHG emissions from a project's construction and operation, determination of significance of the project's impact on climate change, and if the project is found to be significant, the identification of suitable alternatives and mitigation measures.

While it is difficult to predict the specific impact of one project's incremental contribution to the global effects of GHG emissions due to a variety of factors, including the complex and long term nature of such effects and the global scale of climate change, it is possible to determine whether a project is implementing design strategies consistent with the guidance that is available. Thus, if a project implements design strategies consistent with the goals of AB 32, the CAT strategies, and the *LA Green Plan*, the project will not be considered to have a significant impact with respect to global climate change, either on a project-specific basis or with respect to its contribution to a cumulative impact on global climate change. According to the *LA Green Plan*, the City of Los Angeles is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels. To achieve this, the City will, among other things:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and

- Change transportation and land use patterns to reduce dependence on automobiles.[125]

The extent to which the project is consistent with the City's goals will be discussed qualitatively.[126]

(5) Odors (Construction and Operations)

The *City of L.A. CEQA Thresholds Guide (2006)* does not specify a significance threshold with regard to odors. Therefore, for the purposes of this analysis, the significance of odors potentially associated with a project is evaluated based on compliance with SCAQMD rules for construction, and, for operations, based on comparing the project with a list of land uses that are commonly associated with odor complaints.[127]

c. Analysis of Project Impacts

(1) Construction

(a) Regional Construction Impacts

Construction of the project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the project site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily $PM_{2.5,}$ PM_{10}, and NO_x, would result from the use of construction equipment such as bulldozers, loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release VOCs. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources.

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[125] *City of Los Angeles, Green LA, An Action Plan to Lead the Nation in Fighting Global Warming, http://www.lacity.org/ead/EADWeb-AQD/GreenLA_CAP_2007.pdf.*

[126] *The City's green building ordinance relates to goals in addition to GHG emissions reduction, and is discussed in this EIR under Operational Emissions (with regard to significance), and Local Impacts of operations.*

[127] *SCAQMD, CEQA Air Quality Handbook, April 1993, p. 5-5 [changed November 1993].*

In order to provide a conservative analysis, it is assumed that all construction activities would be completed in the timeframe described here. This assumption is conservative as it concentrates the construction duration such that, to the extent reasonable, activities are occurring concurrently. The construction schedule for the project would be approximately 48 months from the start of demolition activities, commencing in 2009, to the receipt of certificates of occupancy, expected in 2013. This timeframe is of particular importance as construction emissions are directly related to the intensity of construction activities (emissions increase as the overall amount of construction activity increases). Actual construction may proceed at a less intensive pace, which would result in lower daily emissions.

To accommodate the proposed uses, approximately 30,723 square feet of existing structures, including the Studio B/C would be removed. The construction phases are assumed to proceed as follows:

- Demolition is expected to occur during months one through six;
- Grading and excavation activities would occur during months seven through twelve of the project schedule, during which approximately 190,000 cubic yards of soil would be exported;
- Construction of the proposed high-rises would occur over a two-year period, representing months 13 through 36; Completion of building finishes would take one year, from month 37 to 48.

A list of the equipment and usage rates expected to be utilized during the various phases of project construction are provided in Appendix B of this EIR. It should be noted that the URBEMIS2007 model, used to calculate emission estimates, does not yet take into account recently promulgated emission standards for off-road diesel construction equipment. Thus, actual emissions from the project will likely be less than those shown.

As presented in Table IV.B-4 on page IV.B-52, construction-related daily maximum regional construction emissions would not exceed the SCAQMD daily significance thresholds for VOC, PM_{10}, $PM_{2.5}$, CO, or SO_x. However, NO_x emissions would exceed the SCAQMD daily significance threshold during the site grading phase. Thus, regional construction emissions would result in a significant short-term air quality impact. Construction phases such as demolition, site preparation and building construction are not expected to overlap. Subphases such as architectural coatings and paving are included under the building construction phase.

Table IV.B-4
Project Construction Emissions (lbs/day) [a]
Unmitigated

	VOC	NOx	CO	SO2	PM_{10} [b]	$PM_{2.5}$
Maximum Regional Emissions (On-site + Off-site) By Stage						
Demolition	4	33	18	<1	4	2
Mass Grading	15	152	70	<1	9	9
Building [c]	66	91	110	<1	5	4
Maximum Regional Emissions	**66**	**152**	**110**	**<1**	**9**	**9**
Regional Construction Daily Significance Threshold	75	100	550	150	150	55
Over/(Under)	(9)	52	(440)	(150)	(141)	(46)
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**
Maximum Localized Emissions (On-site Only) By Stage						
Demolition	3	29	13	<1	4	2
Mass Grading	9	76	37	<1	4	3
Building [c]	63	75	42	<1	6	3
Maximum Localized Emissions	**63**	**76**	**42**	**<1**	**6**	**3.5**
Localized Significance Thresholds [d]	N/A	126	468	N/A	4	3
Over/(Under) Threshold	N/A	(50)	(426)	N/A	2	0.5
Exceed Threshold?	**-**	**No**	**No**	**-**	**Yes [e]**	**Yes [e]**

[a] *Compiled using the URBEMIS2007 emissions inventory model. The equipment mix and use assumption for each phase is provided in Appendix B of this EIR.*
[b] *PM_{10} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*
[c] *Asphalt paving and architectural coating would occur during the building stage.*
[d] *The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a five acre site with sensitive receptors located approximately 25 meters from the construction activity.*
[e] *Although localized emissions exceed LST lookup screening thresholds, detailed dispersion modeling was then performed to more accurately assess potential localized impacts as shown in Table IV.B-6.*

Source: PCR Services Corporation, 2008.

These emission forecasts reflect a specific set of conservative assumptions in which the entire project would be built out over 48 months, using equipment subject only to current, less-stringent emission standards than those applicable in future years. Because of these conservative assumptions, the emissions levels in Table IV.B-4 represent the highest daily emissions projected to occur on any one day, and actual emissions could be less than those forecasted. If construction is delayed or occurs over a longer time period, emissions could be reduced because of (1) a more modern and cleaner burning construction equipment fleet mix, and/or (2) a less intensive build-out schedule (i.e., lower daily emissions occurring over a longer time interval).

(b) Localized Construction Impacts

The conservative estimate of maximum on-site daily emissions for NO_X, PM_{10}, $PM_{2.5}$, and CO was compiled for each phase of construction and compared to the

applicable screening threshold based on construction site acreage and distance to closest sensitive receptor. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD.[128] Look-up tables provided in the LST documents were used to determine localized construction emissions thresholds for the project. The unmitigated maximum daily localized emissions and localized significance thresholds are also presented in Table IV.B-4. As shown therein, maximum localized construction emissions for off-site sensitive receptors would not exceed the localized screening thresholds for NOx or CO. However, localized PM_{10} and $PM_{2.5}$ emissions would exceed the applicable screening-level LST. Thus, the localized effects from the on-site construction emissions of PM_{10} and $PM_{2.5}$ were analyzed using the ISCST3 dispersion model. The results of the dispersion modeling are presented in Table IV.B-5 on page IV.B-54. As shown in Table IV.B-5, maximum PM_{10} and $PM_{2.5}$ concentrations of 8.5 µg/m^3 and 5.5 µg/m^3, respectively, were predicted to occur at the nearest future residential uses (located to the west of project site across El Centro Avenue). As such, PM_{10} and $PM_{2.5}$ localized impacts would remain below the SCAQMD recommended thresholds. Therefore, with respect to localized emissions from construction activities, the impacts would be less than significant.

(c) Concurrent Regional Construction and Operational Impacts

As project construction would occur over a four year period, the potential exists for concurrent construction and operational impacts. In order to identify potential emissions under this scenario, an additional analysis was conducted that takes into account concurrent construction and operational emissions (i.e., the building finishing phases could occur concurrently with the occupancy of the office and residential uses). If this scenario were to occur, the office land uses would be fully occupied and residential would be 20 percent occupied, with some construction activities (building, architectural coating [painting] and asphalt paving) still occurring during Year 2013. Retail and restaurant uses are not expected to be occupied until buildout.

As summarized in Table IV.B-6 on page IV.B-55, concurrent construction and operational regional emissions of CO, PM_{10}, $PM_{2.5}$, and SO_X, would be considered less than significant, since the levels of these emissions would fall below their respective SCAQMD significance thresholds. However, NO_x and VOC would exceed both construction and operational thresholds. Although concurrent construction and operational

[128] *See SCAQMD Localized Significance Thresholds at http://www.aqmd.gov/ceqa/handbook/LST/LST.html, SCAQMD, Particulate Matter (PM) 2.5 Significance Thresholds and Calculation Methodology at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html, the Methodology section above, and Localized Significance Threshold Mass Rate Look-Up Tables at http://www.aqmd.gov/ceqa/handbook/LST/appC.pdf (accessed July 2008).*

Table IV.B-5
Localized Construction Particulate Dispersion Analysis

Construction Activity [a]	24-hr PM_{10} (µg/m^3)		24-hr $PM_{2.5}$ (µg/m^3)	
	Residential		Residential	
	East	West	East	West
Project Incremental Concentration	4.9	8.5	3.2	5.5
LST Threshold	10.4	10.4	10.4	10.4
Over/(Under)	(5.5)	(1.9)	(7.2)	(4.9)
Exceed Threshold?	No	No	No	No

[a] *Maximum PM_{10} emissions occur during excavation.*
[b] *Concentrations take into account Rule 403 fugitive dust control measures*

Source: PCR Services Corporation, 2008.

activities would occur for a short duration (6-12 months), NO_x and VOC emissions would result in a significant and unavoidable impact.

(d) Toxic Air Contaminants

The greatest potential for TAC emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. While it is anticipated that much of the site grading and excavation would be accomplished within a 6-month time period, unforeseen delays could extend these activities. CARB recently promulgated emission standards for off-road diesel construction equipment and off-road vehicles by requiring installation of diesel soot filters and encouraging the replacement of older, dirtier engines with newer emission controlled models. Nevertheless, construction of the project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. In addition, there would be no residual emissions after construction and corresponding individual cancer risk. As such, project-related toxic emission impacts during construction would be less than significant.

(e) Odors

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents, and of diesel engines. SCAQMD Rule 1113 limits the amount of VOCs from architectural coatings and solvents. Compliance with this rule prevents construction materials from creating objectionable odors. In addition, due to the nature of the construction activities and the relatively small footprint of the construction site, there would be

Table IV.B-6
Concurrent Operation and Construction Regional Emissions
(lbs/day)

Emission Source	VOC	NOx	CO	SOx	PM_{10} [b]	$PM_{2.5}$ [b]
Operations-period Daily Emissions [a]	25	38	272	<1	62	12
Construction-period Daily Emissions [b]	65	90	107	<1	5	4
Net Emissions	90	128	379	<1	67	16
SCAQMD Construction Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Over (Under)	15	28	(171)	(150)	(83)	(39)
Significant?	Yes	Yes	No	No	No	No
SCAQMD Operation Significance Threshold	**55**	**75**	**550**	**150**	**150**	**55**
Over (Under)	35	53	(171)	(150)	(83)	(39)
Significant?	Yes	Yes	No	No	No	No

[a] *For purposes of this analysis, assumes office component is fully occupied and 20% of residential uses are occupied for Year 2013.*
[b] *For purposes of this assumption, assumes maximum emissions attributable to construction-period occurs during building finishing stages during Year 2013.*

Source: PCR Services Corporation, 2008.

few pieces of diesel-powered equipment operating simultaneously. Therefore, construction activities are predicted to create a less than significant impact with respect to odors.

(2) Operational Impacts

(a) Regional Operations Impacts

Regional air pollutant emissions associated with project operations would come from the generation and consumption of electricity and natural gas, and by the operation of on-road vehicles. The SCAQMD classifies pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) as regional stationary source emissions. Since it is not possible to identify where electricity is produced, these emissions are conservatively considered to occur within the Basin and are regional in nature. Criteria pollutant emissions associated with the production and consumption of energy were calculated using emission factors from the SCAQMD's *CEQA Air Quality Handbook*.[129]

Operational emissions are primarily a function of vehicle trips. The change in land uses and the resultant increases in trip generation were analyzed. According to the traffic

[129] *SCAQMD, CEQA Air Quality Handbook (April 1993; portions "Changed November 1993"), Appendix 9.*

report by Fehr & Peers/Kaku and Associates (see Appendix H), the project would result in an increase of 9,266 daily trips over existing conditions.

Net mobile-source emissions were calculated using the URBEMIS 2007 emissions inventory model, which multiplies an estimate of the increase in daily VMT by applicable EMFAC2007 emissions factors. The URBEMIS 2007 model output and worksheets for calculating regional operational daily emissions are provided in Appendix B of this EIR.

As shown in Table IV.B-7 on page IV.B-57, the net increase in regional emissions resulting from operation of the project are expected to exceed the SCAQMD thresholds for VOC, NOx, CO PM_{10} and $PM_{2.5}$. Therefore, regional operational impacts would be significant and mitigation would be required.

(b) Local Impacts

Operation of the project does not include new industrial sources. The only substantial new stationary combustion sources identified as likely to be present during operation are boilers (hot water heater), char broilers (restaurant uses) and diesel-fired generators for emergency power generation. Emissions from boilers and char broilers were calculated using USEPA AP-42 emission factors and natural gas usage rates derived from URBEMIS2007. Boilers are expected to operate 24-hours per day and char broilers are expected to operate 16-hours per day.

Unless a blackout occurs, the emergency diesel generators would be operated for only a few hours per month for routine testing and maintenance purposes. The Applicant would be required to obtain a permit to construct and a permit to operate any standby generators under SCAQMD Rules 201, 202, and 203. Under SCAQMD Regulation XIII, all generators must meet Best Available Control Technology (BACT) requirements to minimize emissions of PM_{10} (as well as CO, VOC, and NO_X emissions). Compliance with SCAQMD rules regarding stationary-source combustion equipment would ensure that contributions to localized PM_{10} and $PM_{2.5}$ concentrations remain below the 2.5 $\mu g/m^3$ operational significance threshold.

As shown in Table IV.B-7, localized NOx and CO emissions are less than the applicable LSTs, and no further quantification is needed to determine potential impacts to NOx and CO AAQSs. However, localized PM_{10} and $PM_{2.5}$ emissions would exceed the applicable screening-level LSTs, and detailed dispersion modeling was then performed to refine the assessment of potential impacts. Maximum PM_{10} and $PM_{2.5}$ concentrations of 2.3 $\mu g/m^3$ and 2.2 $\mu g/m^3$, respectively, were predicted to occur at the nearest residential uses (located to the south of project site) as shown in Table IV.B-8 on page IV.B-58. As such, PM_{10} and $PM_{2.5}$ localized impacts would remain below the SCAQMD recommended thresholds. Therefore, with respect to localized on-site operational emissions the impacts for all four pollutants concerned would be less than significant.

Table IV.B-7
Project-Related Operational Emissions (lbs/day)[a]

Emission Source	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Existing Use Emissions						
Mobile[b]	7	11	82	<1	17	3
Area	<1	<1	2	<1	<1	<1
Stationary	<1	5	<1	<1	<1	<1
Total Existing	**8**	**16**	**84**	**<1**	**18**	**4**
Proposed Use Emissions						
Mobile[b]	70	107	810	1	172	33
Area	28	7	25	<1	5	5
Stationary	<1	14	2	1	<1	<1
Total With Project	**98**	**129**	**838**	**3**	**178**	**39**
Net Regional Project Emissions						
Net Mobile	63	96	729	<1	155	30
Net Area[c]	27	7	24	<1	5	5
Net Stationary[c]	<1	9	2	<1	<1	<1
Total Net[d]	90	112	754	2	160	35
SCAQMD Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Difference	**35**	**57**	**204**	**(148)**	**10**	**(20)**
Significant?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**No**
Net Localized Project Emissions[e]	**28**	**16**	**25**	**1**	**5**	**5**
SCAQMD Localized Significance Threshold [f]	**-**	**134**	**1,716**	**-**	**4**	**2**
Difference	**-**	**(118)**	**(1,691)**	**-**	**1**	**3**
Significant?		**No**	**No**		**Yes[g]**	**Yes[g]**

[a] *Mobile and area emissions are calculated using the URBEMIS2007 emissions model. Area sources include natural gas consumption, landscape fuel consumption, residential consumer products and miscellaneous sources (e.g., among other things, commercial solvent usage, architectural coatings). Emissions due to Project-related electricity generation are calculated based on guidance provided in the SCAQMD CEQA Air Quality Handbook. Worksheets and modeling output files are provided in Appendix B.*

[b] *Operational emissions are based on weekend trip generation conditions, not weekday. The incremental increase as compared to existing conditions for weekends was greater than weekdays.*

[c] *Area and stationary emissions take into account a 15 percent reduction in energy usage over Title 24 requirements.*

[d] *Totals may not add up exactly due to rounding.*

[e] *On-Site Emissions include char broilers, natural gas consumption, emergency diesel generators and area sources as mentioned above.*

[f] *The SCAQMD LSTs are based on Source Receptor Area 1 (Central Los Angeles County) for a five acre site with sensitive receptors located approximately 25 meters from the construction activity*

[g] *Although localized emissions exceed LST lookup screening thresholds, detailed dispersion modeling was then performed to more accurate assess potential localized impacts as shown in Table IV.B-8.*

Source: PCR Services Corporation, 2008.

The SCAQMD recommends an evaluation of potential localized CO impacts when a project would increase vehicle to capacity (V/C) ratios by two percent or more at intersections with a level of service (LOS) of D or worse. As indicated in Section IV.I, Transportation and Circulation, of this Draft EIR, traffic would incrementally increase with project under future

Table IV.B-8
Localized Operational Emissions Dispersion Analysis

Operational Emissions Activity [a]	PM_{10}	$PM_{2.5}$
Project Incremental Concentration	2.3	2.3
LST Threshold	2.5	2.5
Over/(Under)	(0.2)	(0.2)
Exceed Threshold?	**No**	**No**

[a] *Localized operational emissions include boilers, char broilers and emergency backup generators Additional detailed provided in Appendix B.*

Source: PCR Services Corporation, 2008.

traffic scenarios, when compared to existing traffic levels, and would meet these criteria at 11 intersection locations. All 11 intersections were analyzed for 2013 build-out.

CO concentration levels at the 11 intersections were forecast using the CALINE4 dispersion model developed by the California Department of Transportation, using peak-hour traffic volumes and conservative meteorological assumptions. Conservative meteorological conditions include low wind speed, stable atmospheric conditions, and the wind angle producing the highest CO concentrations for each case. CO concentrations were modeled under the future (2013) No Project and with project conditions. As shown in Table IV.B-9 on page IV.B-59, project-generated traffic volumes are forecasted to have a negligible effect on the projected 1-hour and 8-hour CO concentrations at the intersections studied. Since a significant impact would not occur at the intersections operating at the highest V/C ratio, no significant impacts would occur at any other analyzed roadway intersection as a result of project-generated traffic volumes. Thus, the project would not cause any new or exacerbate any existing CO hotspots, and, as a result, impacts related to localized mobile-source CO emissions would be less than significant.

(c) Toxic Air Contaminants

Operational TAC Impacts to Off-Site Population

The primary sources of potential air toxics associated with project operations include diesel PM_{10} from delivery trucks (e.g., truck traffic on local streets and on-site truck idling), emergency backup generators and TACS from natural-gas fired boilers. The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel PM_{10} (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[130] CARB's Airborne Toxic Control Measure

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

Table IV.B-9
Local Area Carbon Monoxide Dispersion Analysis 2013

Intersection	Peak Period [a]	Maximum 1-Hour 2013 Base Concentration [b] (ppm)	Maximum 1-Hour 2013 w/ Project Concentration [c] (ppm)	Significant 1-Hour Impact [d]	Maximum 8-Hour 2013 Base Concentration [e] (ppm)	Maximum 8-Hour 2013 w/ Project Concentration [f] (ppm)	Significant 8-Hour Impact [d]
Argyle Avenue and Franklin Avenue	A.M.	6.4	6.4	NO	5.2	5.2	NO
	P.M.	6.5	6.6	NO	5.3	5.4	NO
Argyle Avenue and Hollywood Boulevard	A.M.	6.1	6.2	NO	5.2	5.2	NO
	P.M.	6.4	6.6	NO	5.2	5.3	NO
	A.M.	6.2	6.3	NO	5.2	5.3	NO
El Centro Avenue and Hollywood Boulevard	P.M.	7.2	7.2	NO	5.5	5.5	NO
El Centro Avenue and Sunset Boulevard	A.M.	6.6	6.7	NO	5.4	5.4	NO
	P.M.	6.7	6.7	NO	5.4	5.4	NO
Gower Street and Franklin Avenue	A.M.	6.3	6.4	NO	5.2	5.2	NO
	P.M.	6.5	6.5	NO	5.3	5.3	NO
Gower Street and Hollywood Boulevard	A.M.	6.3	6.4	NO	5.2	5.3	NO
	P.M.	6.4	6.5	NO	5.3	5.4	NO
Gower Street and Selma Avenue	A.M.	6.2	6.4	NO	5.0	5.2	NO
	P.M.	5.9	6.1	NO	5.0	5.1	NO
Bronson Avenue and Hollywood Boulevard	A.M.	6.3	6.4	NO	5.2	5.3	NO
	P.M.	6.3	6.4	NO	5.2	5.3	NO
Gower Street and Sunset Boulevard	A.M.	6.7	6.8	NO	5.4	5.4	NO
	P.M.	6.6	6.6	NO	5.4	5.4	NO
Hollywood Boulevard and Southbound US-101	A.M.	6.4	6.5	NO	5.3	5.4	NO
	P.M.	6.3	6.5	NO	5.2	5.3	NO
Southbound US-101 On-Ramp and Sunset Boulevard	A.M.	7.0	7.2	NO	5.9	5.9	NO
	P.M.	7.6	8.1	NO	6.0	6.4	NO

ppm = parts per million.

[a] *Peak hour traffic volumes are based on the Traffic Impact Study prepared by Kaku Associates.*
[b] *SCAQMD 2013 1-hour ambient background concentration (5.1 ppm) + 2013 Base traffic CO 1-hour contribution.*
[c] *SCAQMD 2013 1-hour ambient background concentration (5.1 ppm) + 2013 w/ Project traffic CO 1-hour contribution.*
[d] *The most restrictive standard for 1-hour CO concentrations is 20 ppm and for 8-hour concentrations is 9.0 ppm.*
[e] *SCAQMD 2013 8-hour ambient background concentration (4.6 ppm) + 2013 Base traffic CO 8-hour contribution.*
[f] *SCAQMD 2013 8-hour ambient background concentration (4.6 ppm) + 2013 w/ Project traffic CO 8-hour contribution.*

Source: PCR Services Corporation, 2008; emission factor and dispersion modeling output sheets are provided in Appendix B.

Table IV.B-10
Operational Emissions Health Risk Assessment

Operational Emissions Activity [a]	Cancer Risk	Chronic Risk	Acute Risk
Project Cancer Risk	9.0	0.004	0.0014
Significance Threshold	10	1	1
Exceed Threshold?	**No**	**No**	**No**

[a] *Health risk assessment includes TAC emissions from boilers, char broilers and emergency generators. Additional detailed provided in Appendix B.*

Source: PCR Services Corporation, 2008.

(ATCM) was adopted in 2004 which limits heavy duty diesel engines from idling for more than 5 minutes at any given time. This applies to diesel powered vehicles with gross vehicle weight ratings greater than 10,000 pounds which are licensed to operate on highways, regardless of where they are registered.

Analysis of localized air toxic impacts from TAC emissions to all nearby sensitive receptors was conducted to assess potential risk. This analysis includes diesel exhaust emissions associated with delivery trucks and on-site emergency generators, and TACs from boilers and char broilers. As shown in Table IV.B-10 above, the results of this analysis yields a maximum off-site individual cancer risk of 9 in a million at the residences located to the south of the proposed project site. Chronic and Acute risk at this same receptor is 0.004 and 0.0014 respectively. As the project would not emit carcinogenic or toxic air contaminants that result in impacts which exceed the maximum individual cancer risk of ten in one million or the chronic or acute index of 1.0, project-related toxic emission impacts would be less than significant.

Operational TAC Impacts to On-Site Population

The ambient air environment that currently exists on and around the project site would also have the potential to impact the residential uses that would be developed as part of the project. Based on CARB siting recommendations, sensitive receptors should not be sited within 1,000 feet of a warehouse distribution center which have extensive heavy-duty truck activity, within 500 feet of a freeway or similar high traffic roadway (i.e., roads within urbanized areas carrying more than 100,000 vehicles per day), within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater), 50 feet for typical gas dispensing facilities or within 300 feet of a dry cleaning facility that uses perchloroethylene, among other siting recommendations. Because the project does not include a distribution warehouse and is not located sufficiently proximate to the listed source types, the siting of residential uses on the project site would result in a less than significant impact with regard to the exposure of on-site residents to the TAC emission sources identified in ARB's siting recommendations (i.e., the

project would not site residential uses in a high cancer risk area due to ambient air quality).[131]

Typical sources of acutely and chronically hazardous toxic air contaminants include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. The project would not include any of these potential sources, although minimal emissions may result from the use of consumer building products for maintenance purposes (e.g. painting). As such, the project would not release substantial amounts of toxic contaminants, and no significant impacts on human health would occur. Based on the limited activity of the toxic air contaminant sources, the project does not warrant the need for a health risk assessment, and potential air toxic impacts would be less than significant.

The project may include the installation and operation of diesel-fired generators for emergency power generation. Unless a blackout occurs, these generators would be operated for only a few hours per month for routine testing and maintenance purposes. The Project Applicant would be required to obtain a permit to construct and a permit to operate any standby generators under SCAQMD Rules 201, 202, and 203. Under SCAQMD Regulation XIII, all generators must meet BACT requirements to minimize emissions of PM_{10} (as well as CO, VOC, and NO_X emissions). Compliance with SCAQMD Rules and Regulations regarding stationary-source combustion equipment would ensure that contributions to localized PM_{10} concentrations remain below the 2.5 $\mu g/m^3$ significance threshold. As such, any potential impacts would be less than significant.

(d) Global Climate Change

Emissions of GHGs were calculated for the existing and projected future uses with implementation of the project. The project's GHG reducing features (such as LEED Silver rating, energy efficiency, etc) were incorporated into the calculation of emissions. Results are presented on Table IV.B-11 on page IV.B-62. Also included is the California Energy Commission's estimated 2004 State-wide inventory, the latest year for which data are available. As shown, the site-specific net increase[132] in GHG emissions from vehicle, electrical, and natural gas usage associated with the proposed project is approximately 0.0035 percent of the 2004 emission level. As described above, this GHG analysis was performed in accordance with existing non-GHG specific SCAQMD and CARB guidance.

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[131] *Such on-site risks to employees or hotel guests would presumably also be less than significant, because those groups would be exposed for less time than residents.*

[132] *The "site-specific" net increase does not account for off-site GHG emission decreases that would occur as people transfer their land uses from off-site locations to the project location. It is reasonable to expect that a large fraction of the net increase would come from such transfers.*

Table IV.B-11
Project Operational Greenhouse Gas Emissions (2013)

Emission Source	CO_2E[e] (Metric Tons)
Existing	
On Road Mobile Sources[a]	2,074
Electricity[b]	651
Natural gas[c]	77
Total	**2,802**
Project	
On Road Mobile Sources[a]	12,679
Electricity[b]	2,598
Natural gas[c]	1,138
Total	**16,416**
Total Net Increase	**13,614**
2004 Statewide Total[d]	**391,000,000**
Net Increase as Percentage of 2004 Statewide Inventory	**0.0035%**

[a] *Mobile source values were derived using EMFAC2007 in addition to the California Climate Action Registry General Reporting Protocol; Version 2.2, March 2007.*
[b] *Electricity Usage Rates from Table A9-11-A, CEQA Air Quality Handbook, SCAQMD, 1993.*
[c] *Natural Gas Usage Rates from Table A9-12-A, CEQA Air Quality Handbook, SCAQMD, 1993.*
[d] *Statewide totals were derived from the California Energy Commission: http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF.*
[e] *All CO2E factors were derived using the California Climate Action Registry General Reporting Protocol; Version 2.2, March 2007. The calculations take into account incorporation of the project's GHG reducing features (such as LEED Silver rating, energy efficiency, etc).*

Sources: PCR Services Corporation, 2008.

There are many uncertainties involved in the quantification of GHGs from any individual project. Newer construction materials and practices, current energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago, but the net effect is difficult to quantify. Thus, the estimated net increase in emissions resulting from implementation of the project presented above may be an over- or under-estimation. These same uncertainties and assumptions exist throughout the accepted analytical methodologies for performing criteria air pollutant assessments.

Emitting GHGs into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased global accumulation of GHGs in the atmosphere that may result in global climate change. The consequences of that global climate change can cause adverse environmental effects. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is not possible to predict the specific impact, if any, on global climate change from one project's relatively small incremental increase in emissions. Thus, significance of potential impacts from GHG emissions is not

apparently determined on a project-level basis, but rather on a cumulative basis (see Section V.C below). However, as described in Section V.C. below, the project is consistent with the goals of AB32 and the CAT strategies; therefore, the project would result in a less than significant impact on climate change.

(e) Odors

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project does not include any uses identified by the SCAQMD as being associated with odors. However, the project does include restaurant uses which have the potential to emit odors through cooking and char broilers. The project will would minimize the release of odors from restaurant uses with odor reducing equipment as necessary. Garbage collection areas for the project would be covered and situated away from the property line and sensitive uses. Good housekeeping practices would be sufficient to prevent nuisance odors. Therefore, potential odor impacts would be less than significant.

(f) SCAQMD Handbook Policy Analysis

In accordance with the procedures established in the SCAQMD CEQA Air Quality Handbook, the two following criteria are required to be addressed in order to determine the project's consistency with SCAQMD and SCAG policies:

1. Will the project result in any of the following:

- An increase in the frequency or severity of existing air quality violations; or
- Cause or contribute to new air quality violations; or
- Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

With respect to this criterion, the SCAQMD requires that an air quality analysis for a project include forecasts of project emissions in a regional context during construction and project occupancy. These forecasts are provided earlier in this section. Since the criterion pertains to ambient pollutant concentrations, rather than to mass emissions, an analysis of the project's effects on pollutant concentrations is used as the basis for evaluating project consistency.[133] As discussed above, localized concentrations of PM_{10}, $PM_{2.5}$, CO, and NO_2

[133] *South Coast Air Quality Management District, CEQA Air Quality Handbook (1993), p. 12-3.*

resulting from construction have been analyzed for the project with reference to localized significance thresholds. In addition, SO_2 emissions would be negligible during construction and long-term operations, and therefore would not have potential to cause or affect a violation of the SO_2 ambient air quality standard. VOC was considered with regard to a regional emissions threshold. There is no ambient standard or localized threshold for VOC, but due to the role VOC plays in ozone formation, a regional emissions threshold has been established.

Particulate matter is the primary pollutant of concern during construction activities, and therefore, the project's PM_{10} and $PM_{2.5}$ emissions during construction were analyzed (1) to ascertain potential effects on localized concentrations and (2) to determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards for PM_{10} and $PM_{2.5}$. Results of the analyses indicate that the increases in PM_{10} and $PM_{2.5}$ emissions are below applicable LSTs. Thus, the project would have a less than significant impact on localized PM_{10} and $PM_{2.5}$ concentrations.

The project's maximum potential NO_X and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. The analysis concluded that CO and NO_2 concentrations would not exceed CAAQS or NAAQS, and potential impacts would therefore be less than significant.[134]

Because this project does not introduce any substantial stationary sources of emissions, CO is the benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. Based on methodologies set forth by the SCAQMD, one measure of local area air quality impacts that can indicate whether the project would cause or affect a violation of an air quality standard would be based on the estimated CO concentrations at selected receptor locations located in close proximity to the project site. As indicated earlier, CO emissions were analyzed using the CALINE-4 model. Based on that analysis, no violations of the State and federal carbon monoxide standards are projected to occur.

Overall, the project would result in less than significant impacts with regard to PM_{10}, $PM_{2.5}$, CO, NO_2 and SO_2 concentrations during project construction and operations. As such, the project would meet the first AQMP consistency criterion.

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[134] *Please note that NO_x is used when describing emissions of nitrogen oxides, but that the ambient air quality standard is for NO_2 levels. The same applies for SO_x (emissions) versus SO_2 (ambient standard concentration). After being emitted, NO_x and SO_x are converted to NO_2 and SO_2 in ambient air.*

2. Will the project exceed the assumptions utilized in preparing the AQMP?

With respect to this second criterion for determining consistency with SCAQMD and SCAG air quality policies, air quality planning within the Basin focuses on the attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing and employment growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the project exceeds the assumptions utilized in preparing the forecasts presented in the AQMP. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three additional criteria: (1) consistency with the population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis of each of these three criteria.

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

A project is consistent with the AQMP in part if it is consistent with the population, housing, and employment growth assumptions that were used in the development of the AQMP. In the case of the 2007 AQMP, two sources of employment data form the basis for the projections of air pollutant emissions, including the City of Los Angeles General Plan and SCAG's Growth Management Chapter of the *Regional Comprehensive Plan and Guide* (*RCPG*). The project is consistent with the types, intensity and patterns of land use envisioned for the site vicinity in the RCPG. Please refer to Section IV.F, Land Use, of this EIR for additional information regarding land use consistency.

The SCAG RTP is based on estimates which imply that employment in the City of Los Angeles subregion of SCAG jurisdiction will grow by about 49,276 jobs between 2008 (the current year) and 2013 (the anticipated project build-out year), that the number of households will increase by 59,528, and that population will grow by about 85,323 people in the subregion during that time.[135] The project is projected to result in a net increase of

[135] *The RTP's estimates are presented in spreadsheets available at http://www.scag.ca.gov/forecast/-adoptedgrowth.htm. The "Adopted 2008 RTP Growth Forecast, by Census Tract," http://www.scag.ca.gov/forecast/downloads/excel/RTP07_TRACT.xls, contains population, household count and employment estimates for census tracts sorted by subregion, for the years 2005, 2010, 2015, etc. Figures presented here were obtained by summing the estimates for census tracts in the City of Los Angeles subregion, and interpolating linearly between the summed every-five-years estimates to obtain population, household count and employment estimates for 2008 and 2013 (Section 12.3 of the SCAQMD Handbook suggests such interpolation). Subtracting the resulting values for 2008 from the corresponding values for 2013 yielded the subregional growth estimates presented here.*

approximately 1,900 full-time equivalent jobs at the project site, or approximately 3.9 percent of the total job growth projected for the subregion. The Project's 400 residential units would represent approximately 0.7 percent of anticipated growth in number of households, and at an average of 2.5 residents per unit, would accommodate 1,000 residents, or approximately 1.2 percent of the population growth projected for the subregion between this year and the project's build-out year. Such levels of population, housing and employment growth are consistent with the population and employment forecasts for the subregion as adopted by SCAG. Because the SCAQMD has incorporated these same projections into the AQMP, it can properly be concluded that the project would be consistent with the projections in the AQMP.

- Does the project implement all feasible air quality mitigation measures?

Implementation of all feasible mitigation measures is recommended to reduce air quality impacts to the extent feasible. The project would incorporate a number of key control measures identified by the SCAQMD, as summarized below. As such, the project meets this AQMP consistency criterion since all feasible mitigation measures would be implemented.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

With regard to land use developments, such as the project, air quality policies such as the proposed AB 32 scoping plan and SB 375 focus on the reduction of vehicle trips and vehicles miles traveled. The project, by virtue of its location and design, exhibits many attributes that have a positive direct and indirect benefit with regard to the reduction of vehicle trips and vehicles miles traveled. Specifically, the project is accessible to the I-101 freeway. In addition, public transit service near the project site is available on two bus lines provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and the LADOT (DASH). Eight Metro Lines and four DASH Lines run in close proximity (within a quarter mile) to the project site. The Metro Red Line Hollywood and Vine Station is also located within walking distance of the project site. With easy accessibility to a number of local and regional transit facilities, the project would also implement important air quality policies that contribute to reducing vehicle trips and vehicle miles traveled.

Additional means by which project development reduces vehicle trips and vehicle miles traveled is by encouraging pedestrian activity in a number of ways including: (1) providing public outdoor spaces which would enrich street life by encouraging walking connections between adjacent uses; and (2) incorporating landscaped areas and walkways linked to adjacent land uses, including a mix of land uses on site, in a manner that would create a pedestrian-friendly environment. Furthermore, the project represents an

investment in high quality urban housing and redevelopment of an underutilized property with existing public infrastructure and in proximity to adequate services and facilities (e.g., retail, banking, restaurants, entertainment and office uses, as well as bus and shuttle services). Thus, project development would reduce costs of infrastructure construction and make better use of existing facilities and in so doing would support the sustainability of the community, all of which are desirable relationships from the perspective of promoting both land use and air quality policies. As the project implements the SCAQMD's objective of reducing vehicle miles traveled and their related vehicular air emissions, the project would be consistent with AQMP land use policy.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the project on air quality in the Basin. While development of the project would result in short-term regional impacts, project development would not have a long-term impact on the region's ability to meet State and federal air quality standards. The project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of PM_{10} and $PM_{2.5}$. Also, the project would be consistent with the goals and policies of the AQMP for control of fugitive dust. As discussed above, the project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

4. Cumulative Impacts

a. Construction

Of the 94 related projects (see Section III) that have been identified within the project study area, there are a number of related projects that are approved or proposed or are currently under construction. Since the Project Applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be highly speculative.

With respect to the project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal Clean Air Act mandates. In accordance with those strategies, the project would comply with SCAQMD Rule 403 requirements, and implement all feasible mitigation measures. In addition, the project would comply with adopted AQMP emissions control measures. Per SCAQMD rules and mandates, as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects Basin-wide, which would include each of the related projects mentioned above. Nevertheless, construction-period

NO_X regional emissions associated with the project are already projected to result in a significant impact to air quality. As such, the project's contribution to cumulative impacts to air quality during project construction would also be significant and unavoidable.

Similar to the TAC emission potential of the project, the greatest potential for cumulative TAC emissions would involve diesel particulate emissions associated with heavy equipment operations during construction. Given that the project's contribution to cancer risk from construction activities would be less than significant and localized, it is reasonable to project that the project together with the related projects would also not result in significant cancer risks from TAC emissions during construction (duration, transient), and that the areas of less-than-significant elevated cancer risks associated with construction of similar projects would not overlap to create a significant risk. Accordingly, the project's construction phase TAC emissions would not contribute to a cumulatively significant impact.

Also similar to the project's impacts, potential sources from the related projects that may emit odors during construction activities at each related project would include the use of architectural coatings and solvents, and emissions from diesel-powered construction equipment. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Via mandatory compliance with this rule, it is anticipated that construction activities or materials used in the construction of the related projects would not create objectionable odors. In addition, due to the nature of the construction activities and the relatively small footprints of the various construction sites, there would be few pieces of diesel-powered equipment operating simultaneously. Thus, cumulative odor impacts from construction of the project together with the related projects are anticipated to be less than significant.

b. Operation

The SCAQMD has set forth both a methodological framework as well as significance thresholds for the assessment of a project's cumulative operational air quality impacts.[136] The SCAQMD's *CEQA Air Quality Handbook* notes that "[t]his approach is consistent with the AQMP, which contains performance standards and emission reduction targets necessary to attain the federal and state ambient air quality standards."[137] This approach takes into account SCAG's future regional growth projections contained in the AQMP.[138]

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[136] *See SCAQMD, CEQA Air Quality Handbook (April 1993; portions "Changed November 1993"), Chapter 9 and Appendix 9.*

[137] *Ibid, p. 9-12.*

[138] *Ibid.*

As such, the analysis of cumulative impacts focuses on determining whether the project is consistent with forecasted future regional growth. If all cumulative projects are individually consistent with the growth assumptions upon which the SCAQMD's AQMP is based, then future development would not impede the attainment of ambient air quality standards and a significant cumulative air quality impact would not occur.

This optional SCAQMD methodology posits that a project would have a significant cumulative air quality impact if, for either population or employment, the ratio of VMT induced by the project to anticipated countywide (population- or employment-related) VMT exceeds the ratio of project-related population or employment to anticipated countywide population or employment. In other words, to pass this significance test, for either residential or employee population, the "rate of growth in vehicle miles traveled must not exceed the rate of growth in population."[139] As shown in Table IV.B-12 on page IV.B-70, the project's VMT ratio does not exceed the employee or population ratio. Based on these criteria, development of the project would have a less than significant cumulative air quality impact. In addition, as previously shown, localized CO impact analyses were conducted for cumulative traffic (i.e., related projects and ambient growth for Year 2013), which demonstrate no local CO violations would occur at any of the studied intersections. As such, the regional emissions that would occur as a result of the project would not be cumulatively considerable.

Cumulatively, the project and related projects would not have a significant local impact with regard to the City's green building ordinance, because under the ordinance each project must meet the criteria for LEED® certification to obtain a building permit and move forward.

With respect to TAC emissions, neither the project nor any of the identified related projects (which are largely residential, restaurant, retail/commercial, and institutional developments), would represent a substantial source of TAC emissions. Uses typically associated with TAC emissions include large-scale industrial, manufacturing, and transportation hub facilities. Based on recommended screening level siting distances for TAC sources, as set forth in the California Air Resources Board's Land Use Guidelines, the project and related projects would not result in a cumulative impact requiring further evaluation. However, the project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products, landscape maintenance activities, among other things. As mentioned previously, the project is not expected to include gasoline dispensing land uses. Natural gas fired boilers may be installed as part of the project. Boilers installed would be required to comply with SCAQMD Rule 1146 which limits pollutant emissions from small and large boilers. Pursuant to the law enacted in 1983 by

[139] *Ibid, Table A9-14, p. A9-126.*

Table IV.B-12
Project Cumulative Air Quality Impacts

Population Increase	
Daily Vehicle Miles Traveled for Project Population [a]	16,851
Daily Vehicle Miles Traveled Countywide [b]	225,754,000
Daily Vehicle Miles Traveled Ratio	**0.00007465**
Project Population	900
Countywide Population [c]	10,798,537
Population Ratio	**0.00008**
Significance Test—Daily Vehicle Miles Traveled Ratio Greater Than Population Ratio	**No**
Employment Increase	
Daily Vehicle Miles Traveled for Project Employment [a]	12,195
Daily Vehicle Miles Traveled Countywide [b]	225,754,000
Daily Vehicle Miles Traveled Ratio	**0.000054**
Project Employment	1,900
Countywide Employment [c]	4,592,290
Employment Ratio	**0.00041**
Significance Test—Daily Vehicle Miles Traveled Ratio Greater Than Population Ratio	**No**

[a] *Increase of vehicle miles traveled as a result of the Traffic Study (refer to Appendix H of this EIR). Data obtained from URBEMIS 2007.*
[b] *Data obtained from EMFAC2007.*
[c] *Data obtained from SCAG's Regional Transportation Plan, Socioeconomic Projections, April 2004.*

Source: PCR Services Corporation, 2008.

California Assembly Bill 1807 (Tanner, Stats. 1983, ch. 1047), as amended,[140] which directs the CARB to identify substances such as TAC and adopt airborne toxic control measures (ATCMs) to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the project would not result in any sources of TACs that have been identified by Land Use Guidelines, and thus, would not contribute to a cumulative impact.

The project and related projects may require the installation of additional back-up diesel powered emergency generators. All new generators would be required to comply with all applicable rules and regulations including BACT. If the installation of new generators results in multiple-generator groups, the installation would also be required to comply with recently promulgated Rule 1472 to ensure that localized risk remains below thresholds. Compliance with Rule 1472, if applicable, would constrain potential impacts. In

[140] *Calif. Health and Safety Code §§ 39650 et seq.*

addition, unless a blackout occurs, these generators would be operated for only a few hours per month for routine testing and maintenance purposes. TAC risk assessments are generally for cancer risk from continuous 70-year lifetime residential or 40-year daytime employment exposure. Emergency generators are operated for far shorter time periods, and their TAC emissions are localized. Therefore, even cumulatively, their emissions are highly unlikely to trigger any risk thresholds of concern. As such, cumulative risk impacts of TAC exposure from emergency generators would be less than significant.

With respect to potential odor impacts, neither the project nor any of the related projects (which are primarily office, residential, retail, and restaurant uses) have a high potential to generate odor impacts.[141] Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement Best Available Control Technology to limit potential objectionable odor impacts to a less than significant level. Thus, potential odor impacts from related projects are anticipated to be less than significant individually and cumulatively.

c. Global Climate Change

It is difficult to estimate what portion of the direct and indirect GHG emissions presented above represent new GHG emissions versus existing displaced emissions. Displaced emissions are those that prior to the project, are created and emitted elsewhere; whereas new GHG emissions are those that do not and would not exist without implementation of the project, creating an incremental increase in emissions. This project would provide housing within a mix of uses to accommodate the projected increase in demand for housing within the region. Those who would occupy new homes already generate GHG emissions through their current activities, and any net increase in such emissions with their relocation to the site would depend on the nature of their current activities, such as the distance of their commute, the energy demand associated with their current homes, and other factors. Accordingly, assuming that all project-related operational emissions are new is conservative. Conservatively, as discussed above, the project is estimated to represent a net increase of 0.0035 percent of 2004 State-wide total emissions.

A sizeable percentage of the operational GHG emissions conservatively associated with the proposed project likely should not be considered new emissions attributable to the project because the future occupants, employees, and residents of the project already generate emissions through their current activities. Further, the emissions estimate does

[141] *According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.*

not reflect improvements in technology and other reductions in GHG emissions that are likely to occur pursuant to State regulations, such as AB 1493, SB 1368, AB 32, and Executive Order S-3-5, as well as future federal and/or State regulations.

Additionally, the project site is accessible by multiple public transportation lines, including Metro Red Line Hollywood and Vine Train Station. The site is also close to several local and regional bus lines operated by the LA Metro and the LADOT. With easy accessibility to a number of local and regional transit facilities, the project would also implement important air quality policies that contribute to reducing vehicle trips and vehicle miles traveled. In addition, the project would encourage pedestrian activity by providing public outdoor spaces that would enrich street life by encouraging walking connections between adjacent uses, and by incorporating landscaped areas and walkways linked to adjacent land uses, including a mix of land uses on site. The project has incorporated design features, such as pursuing LEED certification at the "Silver" level and incorporating measures to reduce the project's VMT, to reduce the project's potential impact with respect to GHG emissions that are consistent with the goals of AB 32 and the CAT strategies discussed in this EIR and summarized in Table IV.B-13 on page IV.B-73.

As discussed above, Assembly Bill 1493 mandates that CARB create GHG emission reduction rules for cars and light trucks. The new rules was proposed to go into effect in 2009 and to be fully implemented by 2016. According to the CEC, the reductions in emissions will be equivalent to reducing gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020. The project is slated for occupancy after these regulations go into effect and therefore a percentage of the cars used by residents of the project will emit lower levels of GHG from VMT than cars currently on the road. New power plant emission standards are proposed and anticipated to go into effect as a result of both the *LA Green Plan* and AB 32. The anticipated emission reductions are not taken into account for this project, and future CO_2e emission factors would be reduced when these measures go into effect. When the rules are fully implemented and older cars are replaced with AB 1493 compliant vehicles there will be further reduction in GHGs from trips to and from the project.

The following planned City actions, as presented in the *LA Green Plan*, when implemented, may further decrease emissions of GHGs from the project:

- Decreasing emissions from Department of Water and Power electrical generation and import activities;
- Providing compact fluorescent light (CFL) bulbs to encourage acceptance and use of CFLs; and
- Expanding the regional rail network to reduce VMT.

Table IV.B-13
Project's Consistency with Recommendations Presented in the CAT Report

Strategies for Reducing GHG Emissions	Project Conformance
Diesel Anti-Idling Reduce GHG emissions from diesel-fueled commercial motor vehicle idling, by reducing idling times and electrifying truck stops.	All construction vehicles would be prohibited from idling in excess of five minutes, both on- and off-site.
Alternative Fuels: Biodiesel Blends and Ethanol Increase the use of alternative fuels that are less GHG-intensive, by adopting regulations to require the use of biodiesel to displace California diesel fuel, increasing the number of flexible fueled vehicles present in California, and increasing the percentage of ethanol used in gasoline.	The project would provide preferred parking to alternative fuel vehicles
Achieve 50 percent Statewide Recycling Goal Achieve California's 50 percent waste diversion mandate (AB 939, Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction. AB 939 required each city or county plan to include an implementation schedule that showed 50 percent diversion of all solid waste by January 1, 2000, through source reduction, recycling, and composting.	The project would divert at least 75 percent of construction waste from disposal.
Urban Forestry Increase carbon sequestration by planting five million trees in urban areas statewide by 2020.	Landscaping for the project would include planting several trees that are the most conducive to sequestering carbon (fast-growing) while being drought-resistant.
Water Use Efficiency Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	The project would use high-efficiency water fixtures, waterless urinals, and water-efficient appliances where appropriate. Landscaping with native plants would also reduce irrigation demand.
Building Energy Efficiency Standards in Place and in Progress Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates building energy efficiency standards that apply to newly constructed buildings and additions to and alterations to existing buildings. Both the Energy Action Plan and the Integrated Energy Policy Report call for ongoing updating of the standards	The project would be designed to meet LEED® certification standards. Therefore, the project would reduce energy consumption by 14 percent beyond Title 24 requirements.
Measures to Improve Transportation Energy Efficiency Advance cleaner transportation and reduce GHG emissions by providing incentives, enhancing outreach and educational programs to bring a coordinated message of sustainable transportation and root causes of GHG emissions, diversifying the transportation energy infrastructure, and slowing the rate of VMT growth.	The project would provide preferred parking to alternative-fuel vehicles and ride-sharing vehicles. Bicycle storage areas for residents and customers as well as employees biking to work would also be provided.
Smart Land Use and Intelligent Transportation Apply strategies that integrate transportation and land-use decisions to reduce VMT, such as promoting jobs/housing proximity, high-density residential/ commercial development along transit corridors, and implementing intelligent transportation systems.	The project would add housing within a major commercial office and mixed use area. The location of the project would be located along a transit corridor.

Table IV.B-13 (Continued)
Project's Consistency with Recommendations Presented in the CAT Report

Strategies for Reducing GHG Emissions	Project Conformance
Green Buildings Initiative Reduce energy use in private buildings.	The project implements several energy-saving "green" design techniques, including but not limited to efficient water systems, landscaping, insulation, heating and cooling systems, and alternative transportation promotion.

Source: PCR Services Corporation, 2008.

The proposed project, by implementing the project design features and GHG-reducing measures described above, results in a net decrease in GHG emissions when compared with "business as usual." In addition, the City of Los Angeles is also taking direct action to reduce emissions from all utility users and improve transportation citywide. The project's features and GHG reduction measures, coupled with the City's initiatives, make the project consistent with the goals of AB32. Thus, the project does not result in a cumulatively significant impact.

5. Mitigation Measures

The following mitigation measures are (1) intended to implement requirements of SCAQMD Rule 403 (Fugitive Dust) and (2) set forth a program of air pollution control strategies designed to reduce the project's air quality impacts to the extent feasible.

a. Construction

Mitigation Measure B-1: General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.[142]

Mitigation Measure B-2: All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. This

[142] *SCAQMD Rule 403 requirements are detailed in Appendix C.*

mitigation measure would reduce all criteria pollutant emissions during construction.

Mitigation Measure B-3: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. This mitigation measure would reduce all criteria pollutant emissions during construction.

Mitigation Measure B-4: Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts. This mitigation measure would reduce all criteria pollutant emissions during construction.

Mitigation Measure B-5: Electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used to the extent feasible. This mitigation measure would reduce all criteria pollutant emissions during construction.

Mitigation Measure B-6: All construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site. This mitigation measure would reduce all criteria pollutant emissions during construction

Mitigation Measure B-7: The Project Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations, in particular Rule 1113 (Architectural Coatings). This mitigation measure would reduce VOC emissions during construction.

Mitigation Measure B-8: The Project Applicant shall moisten soil not more than 15 minutes prior to moving soil or conduct whatever watering is necessary to prevent visible dust emissions from exceeding 100 feet in any direction. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction

Mitigation Measure B-9: The Project Applicant shall apply non-toxic chemical stabilizers according to manufacturer's specifications to disturbed surface areas (completed grading areas) within five days of completing grading or apply non-toxic dust suppressants or vegetation sufficient to maintain a stabilized surface. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-10: Exposed pits (i.e., gravel, soil dirt) with 5% or greater silt content shall be watered twice daily, enclosed, covered, or treated with non-toxic soil stabilizers according to manufacturer's

specifications. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-11: The Project Applicant shall water excavated soil and debris piles hourly or cover them with tarp, plastic sheets or other coverings. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-12: Water exposed surfaces at least twice a day under calm conditions. Water as often as needed on windy days when winds are less than 25 miles per hour or during very dry weather in order to maintain a surface crust and prevent the release of visible emissions from the construction site. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-13: All trucks hauling dirt, sand, soil or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the material and the top of the truck). Wash mud-covered tires and under-carriages of trucks leaving construction sites. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-14: Sweep adjacent streets, as needed, to remove dirt dropped by construction vehicles or mud that would otherwise be carried off by trucks departing the site. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-15: Securely cover loads with a tight fitting tarp on any truck leaving the construction site. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-16: Cease grading during periods when winds exceed 25 miles per hour. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-17: Cease grading during second stage smog alerts. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

Mitigation Measure B-18: Building walls shall be watered prior to use of demolition equipment. This mitigation measure would reduce PM_{10} and $PM_{2.5}$ emissions during construction.

b. Operation

Mitigation Measure B-19: The Project Applicant shall, as feasible, schedule deliveries during off-peak traffic periods to encourage the reduction of trips during the most congested periods. This mitigation measure would reduce all criteria pollutant emissions during operation.

Mitigation Measure B-20: The Project Applicant shall, to the extent reasonably feasible, install energy-efficient appliances (e.g., ENERGY STAR) to reduce energy consumption. This mitigation measure would reduce all criteria pollutant emissions during operation.

- The recommendations listed in Table IV.B-13 apply directly to CAT strategies for reducing GHG emissions and are applied as project mitigation measures as follows:

Mitigation Measure B-20: The Project Applicant shall provide landscaping to include planting several trees that are most conductive to sequestering carbon while remaining drought resistant. Native plants shall be used for landscaping to the extent reasonably feasible.

Mitigation Measure B-21: The project shall reduce its domestic water demand by at least 20 percent through the use of low-water or high-efficiency fixtures, including toilets, urinals, showers, and faucets.

Mitigation Measure B-22: The Project Applicant shall, provide preferred parking to alternative-fuel vehicles and ride-sharing vehicles as reasonably feasible. Upgraded bus waiting areas shall be constructed. Bicycle storage areas for residents, customers and employees biking to work shall be provided.

6. Level of Significance After Mitigation

a. Construction

Implementation of the mitigation measures described above would reduce construction emissions for all pollutants. With implementation of feasible mitigation measures , as shown in Table IV.B-14 on page IV.B-78, maximum daily NO_X emissions during site grading and excavation activities would be reduced to approximately 148 pounds per day. However, as shown in Table IV.B-14, construction NO_X emissions would continue to exceed the SCAQMD regional significance threshold for NO_X during the mass site grading phase. As such, project construction would continue to result in a significant

Table IV.B-14
Project Construction Emissions (lbs/day)[a]
Mitigated[c]

Stage	VOC	NOx	CO	SO_2	PM_{10}[b]	$PM_{2.5}$
Maximum Regional Emissions (On-site + Off-site) By Stage						
Demolition	4	32	17	<1	4	2
Mass Grading	15	148	69	<1	9	7
Building	12	87	108	<1	5	4
Coating	53	<1	1	<1	<1	<1
Asphalt	2	11	8	<1	1	1
Building/Coating/Asphalt Overlap[c]	65	91	110	<1	5	4
Maximum Regional Emissions	**65[d]**	**148**	**110**	**<1**	**9**	**7**
Regional Construction Daily Significance Threshold	75	100	550	150	150	55
Over/(Under)	(10)	48	(440)	(150)	(141)	(48)
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**

[a] *Compiled using the URBEMIS2007 emissions inventory model. The equipment mix and use assumption for each phase is provided in Appendix B of this EIR.*
[b] *PM_{10} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression with additional watering (3x daily).*
[c] *Mitigation includes keeping engines properly tuned and watering exposed surfaces three times daily.*
[d] *Architectural coating and asphalt paving overlap with (and are shorter phases than) building construction. During one time slice with 110 active construction days (assumed to be 1/2/2013 – 6/1/2013), VOC emissions would total (from building, coating and asphalt) up to 65 lbs/day.*

Source: PCR Services Corporation, 2008.

regional impact even with incorporation of all feasible mitigation measures. Cumulative impacts associated with construction of the project described above would also remain significant.

No significant impacts related to TAC emissions during construction are anticipated to occur for the project (see Section 3c(2)(c), above). As such, potential TAC impacts would be less than significant.

The project is not anticipated to generate a substantial amount of objectionable odor emissions during construction. Via mandatory compliance with SCAQMD Rule 1113, no construction activities or materials are proposed that would create objectionable odors. As such, potential odor impacts would be less than significant.

b. Operation

The project includes numerous features to reduce vehicular traffic, including preferential parking for alternative-fueled vehicles and carpools, encouraging the use of mass transit, and encouraging pedestrians and bicycling as viable means of accessing the

project site by employees, residents, and visitors. These project design features have been incorporated into the analysis to reduce mobile source impacts to the maximum extent possible.

In addition, the project is originally designed as a mixed-used development with the intent of reducing vehicular trips and congestion as well as promoting pedestrian travel. This is accomplished by providing housing in close proximity to jobs, services and retail. Trips among such land uses can then occur without, or with very limited use of, private motor vehicles. Although not considered a mitigation measure or project feature, the mixed use design would further reduce mobile source impacts in the region. Additional mobile source mitigation measures as listed above would have a negligible effect on total daily trips.

Although the project would incorporate numerous project design features to reduce operational emissions as well as mixed use design, and is designed to meet the criteria for LEED® Silver designation, regional operational emissions would still exceed the SCAQMD daily emission thresholds for VOC, NOx, CO, and PM_{10} after implementation of the mitigation measures. Therefore, operation of the project would have a significant and unavoidable impact on regional air quality. Because the impact of operating the project by itself would be significant, the cumulative operational impact of the project and related projects would also be significant.

IV. Environmental Impact Analysis

C. Cultural Resources

1. Introduction

This section of the Draft EIR focuses on the project's impacts on cultural historic resources, including historic, archaeological and paleontological resources. The analysis of historic resources is based on the Historic Resources Technical Report for 6121 Sunset Boulevard, Hollywood, California prepared by Historic Resources Group (April 2009). This report is included as Appendix C of this Draft EIR, and is herein incorporated by reference. In addition, the analysis of potential impacts on archeological and paleontological resources is based on records searches that were conducted as well as review of existing conditions within the site.

2. Environmental Setting

a. Regulatory Framework

(1) Historic Resources

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification of, and in certain instances protection of, historic resources. Additionally, states and local jurisdictions play active roles in the identification, documentation and protection of such resources within their communities. The National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); the California Register of Historical Resources; Public Resources Code (PRC) 5024; and the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.130) are the primary federal, state and local laws governing and affecting preservation of historic resources of national, state, regional, and local significance.

(a) Federal Level

(i) National Register of Historic Places

The National Register of Historic Places is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's

cultural resources and indicate what properties should be considered for protection from destruction or impairment." The National Register is administered by the National Park Service. However, the federal regulations explicitly provide that National Register listing of private property "does not prohibit under federal law or regulation any actions which may otherwise be taken by the property owner with respect to the property." Listing in the National Register assists in preservation of historic properties through: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally-assisted projects; eligibility for federal tax benefits; consideration in the decision to issue a surface coal mining permit; and qualification for federal assistance for historic preservation, when funds are available. In addition, for projects that receive federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register follow the standards for determining the significance of properties. Sites, districts, structures, or landscapes of potential significance are eligible for nomination. In addition to meeting any or all of the following criteria, properties nominated must also possess integrity of location, design, setting, feeling, workmanship, association, and materials.

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

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

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.

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

Historic integrity is the ability of a property to convey its significance and is defined as "the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period."

The National Register recognizes seven aspects or qualities that comprise integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- *Location* is the place where the historic property was constructed or the place where the historic event occurred.

- *Design* is the combination of elements that create the form, plan, space, structure, and style of a property.

- *Setting* is the physical environment of a historic property.

- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

- *Feeling* is a property's expression of the aesthetic or historic sense of a particular period of time.

- Association is the direct link between an important historic event or person and a historic property.

In assessing a property's integrity, the National Register criteria recognize that properties change over time. In this regard, National Register Bulletin 15 provides:

> *"To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance.*
>
> *It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.*
>
> *A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style."*

For properties which are considered significant under National Register Criteria A and B, National Register Bulletin 15 states:

> *"A property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).*

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique."

(b) State Level

The Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a State-wide level. The OHP also carries out the duties as set forth in the Public Resources Code (PRC) and maintains the California Historic Resources Inventory and the California Register of Historical Resources. The State Historic Preservation Officer (SHPO) is an appointed official who implements historic preservation programs within the State's jurisdictions. Also implemented at the State level, CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historical resources.

(i) California Register of Historical Resources

The California Register of Historical Resources (California Register) is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.

The criteria for listing in the California Register are based upon National Register criteria. These criteria are:

- Criterion 1: Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California of the United States.
- Criterion 2: Associated with the lives of persons important to local, California or national history.
- Criterion 3: Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
- Criterion 4: Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register of Historic Places (Category 1 in the State Inventory of Historical Resources) and those formally Determined Eligible for listing in the National Register of Historic Places (Category 2 in the State Inventory).
- California Registered Historical Landmarks from No.0770 onward.
- Those California Points of Historical Interest that have been evaluated by the Office of Historic Preservation (OHP) and have been recommended to the State Historical Resources Commission for inclusion in the California Register.

Other resources which may be nominated for listing in the California Register include:

- Historical resources with a significance rating of Category 3 through 5 in the State Inventory. (Categories 3 and 4 refer to potential eligibility for the National Register, while Category 5 indicates a property with local significance.)
- Individual historical resources.
- Historical resources contributing to historic districts.
- Historical resources designated or listed as a local landmark.

(ii) California Environmental Quality Act

Under CEQA, a "project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment."[1] This statutory standard involves a two-part inquiry. The first involves a determination of whether the project involves a historic resource. If so, then the second part involves determining whether the project may involve a "substantial adverse change in the significance" of the resource. To address these issues, guidelines that implement the 1992 statutory amendments relating to historical resources were adopted on October 26, 1998 with the addition of State CEQA Guidelines Section 15064.5. The State CEQA Guidelines provide that for the purposes of CEQA compliance, the term "historical resources" shall include the following:[2]

- A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register.

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[1] *California Public Resources Code, Section 21084.1.*

[2] *State CEQA Guidelines, 14 CCR Section 15064.5(a).*

- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements in Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat such resources as significant for purposes of CEQA unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets one of the criteria for listing on the California Register.

- The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

(c) Local Level – City of Los Angeles

The Cultural Heritage Ordinance was adopted by the Los Angeles City Council in 1962 and amended in 1985 (sections 22.120 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 a knowledge of Los Angeles' history, culture and architecture. Section 22.130 of the Cultural Heritage Ordinance states that an historical or cultural monument is:

"…any site (including significant trees or other plant life located thereon), building, or structure of particular historical or cultural significance to the City of Los Angeles, such as historic structures or sites in which broad cultural, political, economic or social history of the nation, state, or community is reflected or exemplified or which are identified with historic personages or with important events in the main currents of national, state, or local history, or which embody 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 age."

Each nomination is reviewed by the Commission, then the Planning and Land Use Management Committee of the City Council, and the City Council as a whole.

Once a property has been designated a Monument, the Cultural Heritage Commission and its staff review permits for alteration, relocation or demolition. The Commission can delay demolition of a Monument for 180 days and the City has authority to delay demolition for another 180 days. Locally designated cultural resources are presumed to be historically significant under the California Environmental Quality Act. Therefore, demolition and/or alterations of Monuments are subject to review under CEQA.

(2) Archeological/Paleontological Resources

CEQA also requires lead agencies to determine if a proposed project would have a significant effect on archaeological resources (Public Resources Code Sections 21000 et seq.). As defined in Section 21083.2 of the Public Resources Code a "unique" archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

In addition, CEQA Section 15064.5 broadens the approach to CEQA by using the term "historical resource" as identified in the regulatory framework discussion under historic resources above instead of "unique archaeological resource." If a lead agency determines that an archaeological site is a historical resource, the provisions of §21084.1 of the Public Resources Code and §15064.5 of the Guidelines described above under historic resources apply. If an archaeological site does not meet the criteria for a historical resource contained in the Guidelines, then the site is to be treated in accordance with the provisions of Public Resources Code §21083.2, which refer to a unique archaeological resource. The Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. (Guidelines §15064.5(c)(4)).

Paleontological resources are also afforded protection by environmental legislation set forth under CEQA. Appendix G (part V) of the CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, stating that "a project will normally result in a significant impact on the environment if it will …disrupt or adversely affect a paleontologic resource or site or unique geologic feature, except as part of a scientific study." Section 5097.5 of the PRC specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, the California Penal Code Section 622.5 sets the penalties for damage or removal of paleontological resources.

b. Historic Resources

(1) Context

(a) Radio and Television Production in Hollywood

Hollywood was incorporated as a city in 1903. Due to a lack of permanent water supply, however, Hollywood was annexed to the City of Los Angeles in 1910. In the next two decades, Hollywood's population grew primarily due to the motion picture industry. The burgeoning entertainment industry also brought about the development of thriving business districts along Hollywood Boulevard, Vine Street and Sunset Boulevard. Due to its key role in the motion picture industry, Hollywood became a center for radio and television production when these two technologies developed in the early twentieth century.

Radio Broadcast Stations in Hollywood

In the 1920s, improvements in sound recording spurred advancements in radio technology, and radio broadcast stations spread quickly throughout the country. The first important radio stations in the Los Angeles area were KNX, KHJ, KFI, and KFWB, which were all established at the beginning of the 1920s.[3]

Two early Los Angeles broadcast stations were located in Hollywood. In 1919, Fred Christian, was first granted the call letters 6 ADZ, later changed to KGC, and finally to KNX.[4] Christian began broadcasting on September 10, 1920 by playing recorded music borrowed from music stores in return for acknowledgements of the stores on the air. With his "studio" originally a back bedroom in his home on Harold Way, located between Normandie Avenue and Mariposa Street, he was the City's first disc jockey.

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[3] *White, Thomas. Radio History on the Web, The Broadcast Archive, retrieved July 2007, http://www.oldradio.com*

[4] *KNX history from "The Legend Continues," website http://www.knx1070.com/pages/3872.php, retrieved March 2007.*

In 1929, KNX became a 5,000-watt station, and in 1932 it was boosted to 10,000 watts under the ownership of the Western Broadcasting Company, which broadcast from the Paramount lot on Marathon Street in Hollywood. Another power jump to 25,000 watts came in 1933 when KNX moved its studios to the Otto K. Oleson Building at Vine Street and Selma Avenue. In 1935, KNX moved to a new building at 5939 Sunset Boulevard.

KFWB, another important early radio station, was located on the Warner Brothers Studio lot, a few blocks away on Sunset Boulevard. These stations were the precursors of the later development of Hollywood as a national radio center. Access to well-known film talent was important to the success of early radio programming. In exchange movie studio heads pursued the possibilities that radio provided for the film industry, including promoting and exhibiting film talent on the radio. As radio began developing its own stars, the studios produced a series of films featuring radio talent.

Radio Networks In Hollywood

Prior to 1937, American Telephone and Telegraph (AT&T) controlled the telephone lines responsible for the networking of radio stations. The AT&T fee structure effectively charged West Coast radio studios double the cost East Coast studios paid for transmission. After a series of negotiations between AT&T and the new Federal Communications Commission, AT&T agreed to change its fee structure, resulting in lower rates for transmission of radio programs originating on the West Coast. With this change to the rate system, the big networks began plans to build studios in Hollywood.

Two new radio networks were created to link stations across the country. The first network to form was the National Broadcasting Company (NBC) founded by the Radio Corporation of America (RCA). It was soon joined by the Columbia Broadcasting System (CBS) network, which was established in 1927. In 1929, William Paley of CBS had contracted with Los Angeles Cadillac dealer Don Lee, owner of a string of California radio stations, to establish coast-to-coast radio coverage for CBS.[5] Paley and CBS decided to cancel Lee's contracts in 1936 and establish their own national station. That same year, Paley purchased KNX for $1.2 million, and plans were made to build the KNX/CBS studios (Columbia Square) on Sunset Boulevard at Gower, on what had previously been the site of

[5] *Balk, The Rise of Radio. (83-84)*

Hollywood's first movie studio, the Nestor Company, founded in 1911.[6] Paley and CBS decided to cancel Lee's contracts in 1936 and establish their own national station.

By the late 1930s, Hollywood was a major radio production center with operations centered on and around Sunset and Hollywood Boulevards. The development of Columbia Square directly corresponded with this rise of Los Angeles as a media power and major exporter of entertainment.

World War II effectively ended this golden period in radio broadcasting. During the war, the ban of all non-essential electronic manufacturing resulted in a 50 percent decrease in the sale of radios from 1941 to 1943. After the war, radio's popularity was further eclipsed with the growing popularity of television.

Television in Hollywood

As the 1940s progressed, Hollywood added television production to its motion picture and radio outlets. In 1947, KTLA in Hollywood became the first commercial television station in the West. Hollywood motion picture studios expanded into the television business during this period, and similar to the early days of radio, initially thought of television as a cross-promotional platform for their films and film stars. Pay television systems were designed to provide access to feature films, followed by experiments in theater television, which projected television programming onto a screen in a movie theater. By the early 1950s, Hollywood motion picture studios embarked on direct production for television.

It was the radio broadcasting companies, however, who exerted the most influence on the development of television as a national medium. The "big three" radio broadcasting companies – ABC, NBC, and CBS –became the leading television broadcasters, and had a larger role in the early development of the industry than the major film studios. Early television programming borrowed extensively from radio formats, and the first television successes were variety shows that drew inspiration from radio variety programs.

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[6] *Raphael, Judy. Hollywood's Broadcast Beginnings. Discover Hollywood Magazine, 2003. (11); and Ross, Steven J. "How Hollywood Became Hollywood: Money, Politics, and Movies." In Tom Sitton and William Deverell, eds., Metropolis in the Making: Los Angeles in the 1920s. Berkeley: University of California Press, 2001. (258)*

(b) CBS and William Paley

CBS traces its origins to the creation of the United Independent Broadcasters network on January 2, 1927. Established by New York talent agent Arthur Judson, United soon looked for additional investors. The Columbia Phonographic Manufacturing Company (also owners of Columbia Records), rescued the failing company in April 1927, and as result the network was renamed the Columbia Phonographic Broadcasting System. Columbia Phonographic went on the air on September 18, 1927 from flagship station WOR in Newark, New Jersey, with 15 affiliates.

A central figure in the development of both radio and television broadcasting was William S. Paley. Along with NBC head David Sarnoff, Paley was one of the influential founders of modern broadcasting.[7] Recognizing the business potential of radio, in 1928 he purchased Columbia Phonographic. That same Paley relocated to New York and signed 49 affiliates to his new company, paving the way for the future of the Columbia Broadcasting System, which he would lead for over 60 years. Paley built CBS into a global communications corporation and signed many leading celebrities including Bing Crosby, Bob Hope, and Jack Benny.

Paley was also influential in the development of broadcast news. In 1933, newspaper publishers, worried about increasing competition from radio broadcasts, prohibited wire services from working with radio stations. In response Paley created CBS News, which he built into one of the world's preeminent news organizations, with the industry's leading talent including Edward R. Murrow, Eric Sevareid, and Howard K. Smith. Following the war, Paley continued to recruit talent to the network, later signing Walter Cronkite.

In 1936, Paley transferred CBS Vice-President D. W. Thornburgh from Chicago to Hollywood. Thornburgh was responsible for overseeing the construction of Columbia Square. He described it as an "ideal radio workshop." Under Thornburgh's leadership, network coverage from Columbia Square expanded from two to 40 programs per week. He remained with CBS until 1949, when he became the president of WCAU, Inc., in Philadelphia.[8]

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[7] *"About William S. Paley." http://www.paleycenter.org/about-mission-history-william-s-paley. accessed March 2009.*

[8] *"Thornburgh to Leave CBS Post for Philadelphia Job," Los Angeles Times, May 30, 1949; California Arts & Architecture, July 1938.*

(c) CBS Programs

During the 1930s, the programming at CBS continued to expand to include notable shows such as Campbell Soup's Show starring Jack Carson; General Electric Presents House Party starring Art Linkletter; Rinso Presents "Big Town" starring Edward G. Robinson with Claire Trevor, CBS presents "Mike Stokey's Pantomime Quiz Time," and Phillip Morris Presents Horace Heidt. Journalist and writer of radio dramas Norman Corwin commented that, "Columbia Square was one of the glories of radio. It was somewhat sacred to those in the industry. There was nothing comparable to its splendor in New York."[9]

During the economic boom that followed World War II, television gained in popularity. In the late 1940s, only 10 percent of American households had television sets; by 1959, only 10 percent of the population did not own a television. CBS television was launched in 1949 with the formal dedication of KTTV-LA/CBS-Television at the Columbia Square Complex, one week before NBC instated its television division. Jack Benny led the inaugural showcase which included Margaret Whiting, Bing Crosby, and the Andrews Sisters. The established radio broadcasters (ABC, NBC, and CBS) became leaders in the burgeoning television industry, aided by their access to well-known radio talent to populate television shows. Paley in particular was known for his ability to persuade radio stars to make the transition to television.

CBS soon had shows such as Amos n' Andy, Red Skelton, Burns and Allen, and Johnny Carson's first television show "Carson's Cellar." Early television comedians who got their start on the radio include Jack Benny, Ed Wynn, and Lucille Ball. In 1951, the pilot of "I Love Lucy" was filmed at Columbia Square. As the popularity of television grew and production expanded, the sharing of studios between radio and television began to take place. CBS started using any available facilities nearby, which included the El Capitan Theater on Vine Street (now known as The Palace); the CBS Vine Street Playhouse (site of their Lux Radio broadcasts); and the Roosevelt Hotel and Knickerbocker Hotel ballrooms.

The growing popularity of television prompted CBS to build "Television City" in the Beverly-Fairfax District, which opened for production in 1952, followed by the purchase of the CBS Studio Center in Studio City in 1967. These new facilities contributed to the decline of Columbia Square as a major broadcast center. Some of the Columbia Square Complex's radio studios were converted to recording studios for Columbia Records, where Bob Dylan and Barbara Streisand both recorded albums. The local affiliate KCBS-TV continued operations at the site. In 2005, KNX News Radio relocated to new studios in

[9] *Hollywood Heritage, "Historic-Cultural Monument application for CBS Columbia Square," September 9, 2008.*

Wilshire Boulevard's Miracle Mile area, ending its 85-year history in Hollywood. In 2005, television programming was also relocated from the Columbia Square Complex site. Both KCBS-TV Channel 2 and KCAL-TV Channel 9 moved to new headquarters in Studio City in that year, ending over eight decades of entertainment production on the site.[10]

(d) Site History

The Columbia Square Complex was the site of the first movie studio in Hollywood, and has been home to radio and television studios since 1937. Radio stations KNX, KCBS-FM (formerly KNX-FM), and television stations KCBS-TV (Channel 2, formerly KNXT and KTSL) have all produced programming at the project site. Independent television station KCAL-TV (formerly KHJ-TV) moved to the Columbia Square Complex in 2002.

In the 1950s, the original CBS lot was expanded to encompass another block to the north. The original lot was bordered by Sunset to the south, Gower to the east, El Centro to the west and Harold Way to the north. To join the two lots Harold Way was vacated in 1954-55 making the new northern boundary for the site Selma Avenue. The northern half of the new block was cleared for use as a parking lot.

In 1899, the property was occupied by the Cahuenga House, also known as the Blondeau Tavern. In 1911, the Nestor Film Company created the first studio in Hollywood in the Blondeau Tavern, remodeling it for motion picture production. The company produced the first film made entirely in Hollywood, "Law of the Range" that same year. In 1912, the Nestor Film Company studio complex burned, destroying most of the original tavern building. A new wooden structure was built on the site and a new sign erected which read "Christie Film Company, Manufacturers of Nestor Comedies for Universal Films." Between 1912 and 1915, several Universal productions were filmed in buildings around Sunset and Gower. In 1915, Carl Laemmle moved Universal Films to the San Fernando Valley, which later became Universal City.

After Laemmle moved his primary operations to Universal City, film producer Al Christie expanded the Gower and Sunset lot. From 1918 to 1920, he built more buildings for new production departments. The rear of the site held sets for the Christie comedy productions. The Christie lot spanned from El Centro on the west to Gower Street to the east, with Harold Way as its northern boundary. In 1924, Christie completely remodeled the old wooden studio at Gower and Sunset into a Mediterranean Revival building. The Christie Studio became was a well-known Hollywood landmark, with

[10] *Pool, Bob. "Hollywood, Radio Finally Part Waves," Los Angeles Times, August 11, 2005.*

billboards on the sides of the studio announcing Christie's feature comedy releases. In 1932, the Christie Studio was renamed Amalgamated Motion Picture Studios and used as a rental facility.

(i) Columbia Square Complex

In 1936, the LA Times announced "Old Christie Studio Razed for Radio Network Station," and the by-then neglected studio was demolished later that year. On April 27, 1937 the groundbreaking ceremony for Paley's new Central Broadcasting System facility took place in a star-studded event. The new facility was meant to create a prominent CBS presence in Hollywood. Paley wanted the CBS headquarters to show that it was "a progressive and innovative company in a progressive industry," which for him had a specific aesthetic expression.[11] Paley wanted the architecture of Columbia Square to help establish the corporate brand, and also to showcase innovative architectural solutions to the technological needs of the growing entertainment industry.

Paley hired renowned architect William Lescaze to design the new headquarters for the network. Lescaze was able to work with CBS' team of engineers, acoustics specialists, and technology experts to integrate the practical needs of radio broadcasting with the design.[12] His new studio within the old theater was a sensation. The Architectural Forum commented that the design was "admirably suited to radio, the 'new' art which sometimes tries so hard to take on an elfin Hollywood spirit, which architecturally, at least is something rarely to be emulated."[13]

For the Columbia Square Complex, Lescaze working with associate Earl T. Heitschmidt, designed three International Style buildings for the site: the Radio Building, Studio A, and a third commercial wing that housed the Radio Center Restaurant and a bank (later referred to as the Television Building). The complex was well publicized at the time of its construction, featured in many architectural publications including Architectural Forum in May 1937, the July 1938 edition of Architectural Record and in California Arts and Architecture in July 1938. The latter article noted that the complex is "magnificent concrete evidence of radio's independence in the amusement field." The interiors were designed to accommodate the latest technologies and broadcast innovations, and the complex was described as "an inspiring monument to radio, and the cornerstone in the Pacific Coast's

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[11] *Doordan, Dennis. "Design at CBS," Design Issues Vol. 6 (Spring 1990). (148)*

[12] *Doordan. (149-150)*

[13] *Stern, Robert A. M. New York 1930, New York: Rizzoli 1994. (267)*

destiny as the nucleus of American broadcasting."[14] It was also the first building to integrate broadcasting's technological needs with the ability to include live audiences.

At the Columbia Square Complex, Lescaze designed an integrated complex that accommodated both the public crowds and broadcasting's technical needs. The design also solved concerns such as sound baffling through the design of floating walls inside the studios to act as sound barriers. Lescaze also angled some studio walls and the window panels in the control and sponsor booths at Columbia Square to reduce potentially interfering reflection both acoustically and visually.[15] He also designed a third commercial building at the corner of Sunset Boulevard and Gower Street that housed a restaurant and leasable office and retail space to attract people to linger after visiting CBS, and to provide the network with additional revenue opportunities.

Studio A, located at the north end of the central courtyard, was the largest studio on the site. It had 1,050 seats to accommodate studio audiences for radio shows, and later for recording sessions for Columbia Records. Studio A was later converted for television use, and the 1949 Ed Wynn Show was the first television program to be produced at Columbia Square. In 1951, the pilot for I Love Lucy was shot in Studio A.

The Columbia Square studios were laid out into 32 departments/facilities. The first floor included a master control room; five studios, dressing rooms; engineering; an artist's lounge; organ chamber; restaurant and kitchen; cocktail bar; retail space and a commercial bank. In 1939, Paley hired the celebrated Los Angeles firm Parkinson & Parkinson to design another studio building to complement the original Lescaze buildings. Studio B/C housed two large studios equipped for radio production and live audiences of up to 400 people. Studio B/C was the home of the Lucky Strike Show starring Jack Benny and the Bing Crosby Radio Show, among others. During the 1960s, which is outside the period of significance defined in this report, Studio B/C served as recording studios for musicians such as Miles Davis, Bob Dylan, and Janis Joplin.

The Lescaze and Parkinson-designed components were integrated on both the interior and exterior to create a unified structure around a central courtyard on Sunset Boulevard. Parkinson & Parkinson's subtle design approach and the lack of visibility of Studio B/C from Sunset were specific design decisions to increase the functionality of the complex without competing with the existing architecture. There is a clear hierarchy of the

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[14] *"The New Home of the Columbia Broadcasting System," California Arts and Architecture V. 54 (July 1938): 28-29.*

[15] *"New Home of the Columbia Broadcasting System at Columbia Square in Hollywood, California." California Arts and Architecture, Volume 54, July, 1938. (28–29)*

components with the Lescaze-designed elements comprising the public face of the building with the most overt International Style elements. Studio B/C was a secondary, utilitarian space with a different provenance than the original buildings.

There were two additional periods that led to substantial changes to the original design of the complex. In 1961, the Los Angeles firm of Allison and Rible was hired to create additional studio space on the east end of Studio B/C; changes to the entrance canopy facing the courtyard, and alterations to the interior studio spaces were also made at this time. In 1968, William Pereira was commissioned to do some minor alterations to the complex which resulted in significant changes to appearance of the International Style elements of the façades. The canopy connecting Studio A with Studio B/C was framed in and clad in stucco, as were the first floor glass facades of the Radio and Commercial/Television Buildings that framed the courtyard. The current condition of the complex still reflects these changes. In addition, as discussed in more detail below, subsequent modifications to remove theater stages, seating, and other features from the interior of Studio B/C further compromised its historic integrity.

Although the work by Allison & Rible and William Pereira are non-contributing features constructed outside the period of significance for the complex, it is important to note that Paley continued to hire prominent architectural firms to work at the site. Although, these were minor commissions for Allison and Rible and William Pereira, it is significant that CBS was hiring top talent and firms with significant bodies of work in Los Angeles..

(2) Existing Site Conditions

As shown in Figure II-3 in Section II. Project Description of this document, the project site is presently improved with four structures occupying a total of 136,233 square feet of floor area. Table IV.C-1 on page IV.C-17 provides a floor area breakdown of the floor area of these structures. The existing buildings within the project site are located within the southern portion of the site that front along Sunset Boulevard. These buildings and associated outdoor courtyard are referred to as the Columbia Square Complex. Figure IV.C-1 on page IV.C-18 depicts the layout of the Columbia Square Complex. As shown, the Radio Building (1st Wing), Studio A (2nd Wing), and the Commercial/Television Building (3rd Wing) comprise the bulk of the complex and were completed in 1937. Studio B/C (4th Wing) to the northeast was completed in 1938. The buildings were fully integrated to create one seamless interior at the time of construction. The reinforced concrete buildings are rectangular in plan with an irregular roofline. The Radio Building (comprised of the KNX Tower and KNX Building) is five stories with a basement level, a mezzanine level, and a roof-top penthouse. Studio A is a two-story structure. The Commercial/Television Building (KNXT Building) is a two-story structure and Studio B/C is a two-story building that houses studios B and C. The building is now covered with painted stucco, but was originally left as unfinished concrete according to historic photos.

Table IV.C-1
Existing Buildings within Project Site

Building/Use	Building Area
Radio Building KNX Tower/Building (1st Wing)	57,978 square feet
Studio A (2nd Wing)	19,102 square feet
Commercial/Television Building/KNXT Building (3rd Wing)	31,664 square feet
Studio B/C (4th Wing)	27,489 square feet
Total	**136,233 square feet**

Source: AREA Property Partners, 2009.

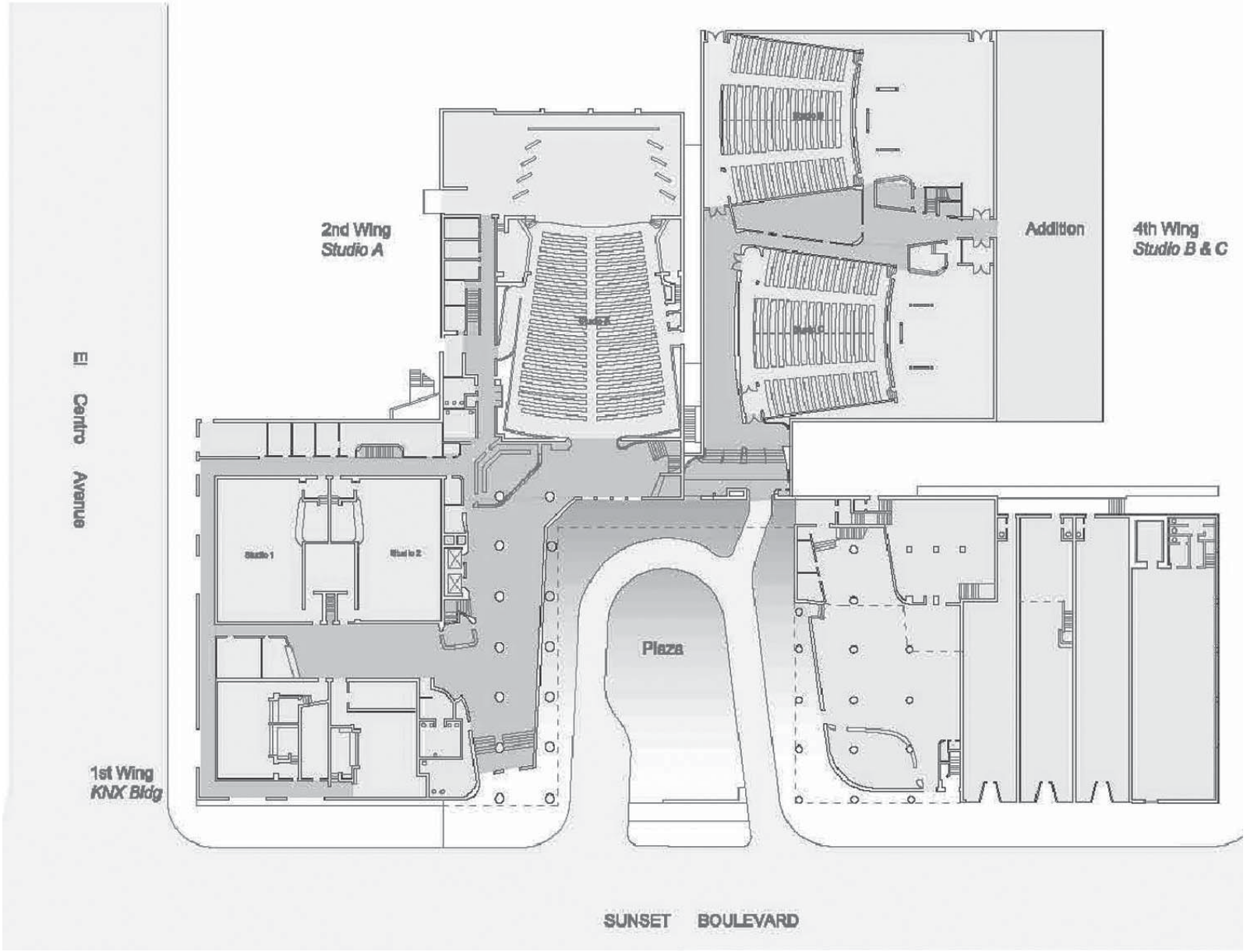
The remaining portion of the project site consists of a surface parking lot used by employees of the currently leased office and studio space located in the southern portion of the project site. The parking lot is accessed from El Centro Avenue via a security kiosk located near the El Centro Avenue entrance and is patrolled by security 24 hours per day. The project site also contains a planted courtyard facing Sunset Boulevard (the Sunset Courtyard), and there is limited landscaping consisting of ornamental trees including fig, crabapple, lemon bottlebrush, southern magnolia, California fan palm, jacaranda, and Mexican fan palm provided primarily along the perimeter of the site.

(a) Design Intent: Role of the International Style

The design of the Columbia Square complex is a classic and early example of the International Style as interpreted in the United States. The International Style − an architectural aesthetic that stressed rationality, logic, and a break with the past − emerged in Europe in the 1920s with the work of Le Corbusier in France, and Walter Gropius and Ludwig Mies van der Rohe in Germany, where the Bauhaus School trained a future generation of Modern architects. Their buildings were minimalist in concept, stressed functionalism, and were devoid of regional characteristics and nonessential decorative elements. They were working to establish a new architectural style that was reflective of the Modern era.

In 1932, New York's Museum of Modern Art hosted an architecture exhibition curated by Henry Russell-Hitchcock and Philip Johnson entitled "The International Style: Architecture Since 1922." The accompanying publication was the first to name and define the style, introducing the American public to the new European approach to design and highlighting its major practitioners.

The Nazis closed the Bauhaus in 1933, and Gropius and Mies van der Rohe fled to the United States, by which time they had both established international reputations as pioneers of Modern architecture. Mies taught at the Illinois Institute of Technology, and



Columbia Square

matrix environmental

Not to scale

Figure IV.C-1
Layout of Columbia Square Complex (1939)
Interior Subsequently Altered

Source: Historic Resources Group, LLC, 2007

Gropius at the Harvard School of Design. This meant that the tenets of International Style Modernism were now being promoted in the United States by two of its leaders. Architects Richard Neutra and Rudolph Schindler, along with William Lescaze, are credited with broadly introducing the International Style to the United States. On the West Coast, the International Style was primarily seen in residential architecture. Lescaze's design for the Columbia Square Complex was an early example of the application of the International Style for commercial use.

(i) Exterior

The Columbia Square Complex's primary façade faces Sunset Boulevard to the south. The north (rear) façade faces the parking lot. The east façade faces Gower Street and the west façade shares a portion of the parking lot and faces El Centro. All façades are painted board-formed concrete with steel sash windows in a regular fenestration pattern. The buildings are generally characterized by flat surfaces with bands of steel sash casement windows and flat roofs. There is little ornamental detailing on the exterior façades, consistent with the ideals of the International Style. The building is now covered with painted stucco, but historic photographs indicate that it was originally unfinished concrete. The Columbia Square Complex is also notable for Lescaze's use of three buildings to address different commercial functions. The buildings are discrete volumes integrated with interior and exterior circulation, situated around a central courtyard which is open to Sunset Boulevard.

Lescaze employed nearly every tenet of the International Style at the Complex, interpreted in a manner unique to Los Angeles. Lescaze softened the sometimes harsh lines of International Style structures by using elements of the Streamline Moderne in his design for the Columbia Square Complex. The overall rectilinear massing of the Columbia Square Complex elements is broken up with curvilinear lines, subtle asymmetries, and porthole windows. He also introduced the use of glass block to the penthouse of the Columbia Square Complex, at the time still seen as an avant-garde way of introducing light and transparency into a concrete volume. The division of spaces by separate functions is also a break from Modernism's concrete boxes, and demonstrates Louis Sullivan's approach of "form follows function." These elements that Lescaze introduced in his only work on the West Coast are unique expressions that he did not employ in commissions in New York or other locations on the East Coast.

Radio Building

The Radio Building is five stories with a basement level, a mezzanine level and a roof-top penthouse. It is the most prominent and recognizable component of the Columbia Square Complex. Le Corbusier promoted the Greek ideal of designing structures that were meant to be seen from all sides, instead of just presenting a street face. Lescaze sited the

Radio Building perpendicularly to the street as a gesture to this idea,[16] which also enabled the creation of a courtyard framed by the buildings in the complex. The courtyard originally functioned as an automobile courtyard, incorporating a paved driveway that allowed cars to drop off passengers. The flagpole and its placement are original.

Le Corbusier's influence is also seen in the building's rectangular massing, with a recessed ground floor that accommodates a series of pilotis that elevate the building off of the ground and creates a colonnade at the pedestrian level. Lescaze also incorporated a free plan and bands of horizontal windows into the design. The windows are almost flush with the concrete façade and wrap at the corners, creating a unified exterior. The upper four floors have uninterrupted bands of horizontal windows with metal mullions continuing perpendicular onto the front elevation. The windows alternate between casements and fixed sash, which create a rhythm on the exterior and contribute to the overall feeling of lightness of the structure.17 The west elevation contains an additional band of horizontal and clerestory windows on the third to sixth floors and porthole windows.

The most prominent and historically recognizable detail on the exterior of the Radio Building is the protruding sign board that hangs from the fourth and fifth floors on the south façade, facing Sunset Boulevard. The sign formerly displayed the "CBS" call letters, and originally included "KNX" underneath. The sixth story is recessed from the front and east elevations and has an interrupted band of glass brick on the corner of the front and west elevation. Along the east side of the penthouse is a row of steel sash casements windows with wire glazing. The roof also houses non-original miscellaneous mechanical equipment and related structures. Adjacent to the tower along Sunset Boulevard is a one-story volume with a solid flat surface lined with billboards.

Studio A

The double-height Studio A is located on the north side of the courtyard. Although not as prominently sited as the other Lescaze-designed components, Studio A was originally designed to incorporate the International Style vocabulary used by Lescaze.

Commercial/ Television Building

The Commercial/Television Building housed restaurant, stores, and a bank. It is a two-story building, adjacent to the central plaza on the east. Like the Radio Building, it also

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[16] *Moore, Charles, The City Observed: Los Angeles. Santa Monica, CA: Hennessey + Ingalls: 1984. (172)*

[17] *Ibid.*

contains a pilotis-style colonnade of six slender rounded columns with an uninterrupted ribbon of windows on the upper floor. Recessed behind the columns is a shade screen consisting of horizontal strips of metal running the length of the façade. Recessed floor to ceiling casement windows line the building and are rounded at the corner of the building.

Studio B/C

Studio B/C, the fourth major component of the site, is a two-story building of reinforced concrete, added in 1939 and integrated into the existing campus. Studio B/C is not visible from Sunset Boulevard except where it continued the Lescaze-designed existing entrance to Studio A. Studio B/C is utilitarian in nature, and had minimal International Style detailing along the façade facing Sunset (which has since been altered).

(ii) Interior

Each building served a separate function, and the interiors were designed accordingly. The CBS/KNX office tower contained the executive and management offices, marketing, and archival staff; its ground floor served as the compound's main lobby. The double-height Studio A, originally housed live radio productions and Columbia Records. The Television Building/Radio Center restaurant, stores & bank was devoted to leasable commercial space, originally housing offices and stores flanked by a restaurant on the east and a bank on the corner of Sunset Boulevard and Gower Street. In general, the interiors retain many character-defining features. While some of the corridors and office spaces have been materially altered, important spatial relationships remain.

There are several different types of doors present in the Complex; some retain their original hardware. There are painted flush doors with metal square glazed panel windows or metal framed porthole windows. While some of the hallways have been narrowed, the basic spatial relationships remain intact. Interior character-defining features include:

- The configuration of spaces and connections between Studio A, B/C
- Upper floor radio studio configurations
- Board form poured concrete walls
- Elevator lobby and passenger elevators
- Curved walls
- Stairways with wall mounted pipe hand rails

- Tile floors
- Painted doors with metal framed port holes, glazed panels or other openings
- Use of glass block

Radio Building

The Radio Building's first floor includes an entrance lobby opening on to El Centro Avenue. A corridor leading from the entrance lobby to the elevator runs along the west side of Studio A. The remaining five floors are all similar in spatial layout, containing offices and second floor recording studios. Curving interior walls with nautical-themed porthole windows and railings are common throughout. Original details include painted, flush doors (some with porthole windows), glazed panel windows and simple steel hardware. The floors are resilient tile.[18] The penthouse, atop the Radio Building, is rectangular in shape. The penthouse room currently houses one office. The floor of the penthouse is poured concrete with a scored pattern.

Studio A

Studio A is a two-story structure with a basement. The ground floor of Studio A contains a large open office space with cubicles and a working television studio. The upper level historically held the live audience; presently this space is used for storage. The basement houses rooms for mechanical uses and a small restroom with shower.

Commercial/Television Building

The Commercial/Television Building includes a basement that houses production equipment, and a mezzanine level, that is now used as office space. The first floor, once devoted to publicly accessible retail spaces, has been repartitioned for interior office space. The restrooms have glazed tile walls with built-in sinks and tile counters.

Studio B/C

Studio B/C houses one working studio and a second studio that has been converted into a technical equipment facility. The curved west wall of the corridor leading into this

[18] *The resilient tile may not be original but has been in place since early on in the complex's history, as seen in photos.*

section of the complex, as well as the curving wall in the corridor leading from Studio B to Studio C, remain intact. Restrooms with original glazed tile walls can be found behind painted flush doors.

(iii) Alterations

There have been many alterations to the Columbia Square Complex throughout its history. A selected sample of building permits issued between 1937 and 2002 is included in Appendix C. It is the nature of studio and broadcast facilities to be altered to adapt to changing needs and technologies. A 1937 Architectural Record article highlighting new production facilities in Hollywood states that "No building type is more haunted by the specter of obsolescence than a broadcasting station. Constant developments in acoustics, lighting, atmospheric control – as well as in the equipment itself – demand the greatest flexibility in building design. And Hollywood, one of the world's broadcasting centers, feels this most acutely."[19] Despite the changes, however, the Complex still conveys its historic association with the history of radio and television broadcasting. All four buildings are in the same original setting with their original spatial layout as completed in 1939. With the exception of Studio B/C, as discussed below, the complex continues to exhibit sufficient architectural integrity of its character-defining features.

Courtyard/Canopy

The courtyard was originally a U-shaped driveway to accommodate automobile traffic, including access to parking behind underneath the original Lescaze-designed canopy extending from Studio. Along with the construction of Studio B/C in 1939, Parkinson & Parkinson extended the existing canopy of Studio A to create an entrance from Studio B/C into the courtyard. Parkinson also reconfigured the Lescaze pedestrian and driveway openings that were under the canopy to accommodate the addition of Studio B/C.

In 1968, the Parkinson & Parkinson-designed canopy connecting Studio A with Studio B/C was framed in and clad in stucco by prominent architect William Pereira. Pereira also altered the exterior facades facing the courtyard. The original glass walls and piloti on the west side were obscured with stucco and standard commercial doors were installed. The north façade was also filled in with stucco walls and commercial doors. The loss of integrity to the facades facing the Sunset courtyard spanned both the Lescaze and

[19] *"'Music in the Air' Keeps Building Designers Stepping," Architectural Record (July 1937).*

Parkinson components. A steel security fence has been erected in recent history along southern boundary of Columbia Square.

Radio Building

The original glass wall on the office tower's east façade (facing the square) was filled in stucco walls punctuated by standard commercial doors. Additionally, a new wall of painted stucco-coated concrete and aligned with the original, striking horizontal canopy stretching the full length of the north façade (facing the square) has been erected. These additions may be reversible, using existing drawings and extensive historic photographs.

Commercial/Television Building

In the 1950s, the exterior of the restaurant was altered with the addition of metal louvers on the west and north windows, and a glass wall replaced the original curving wall designed by Lescaze. The Columbia Square Complex celebrated its twentieth anniversary in 1958, and with it came some alterations to the complex. The restaurant and stores housed in the Commercial/Television Building were converted to internal office space, leaving only the Bank of America as a tenant. The CBS signage on the exterior was modified at this time as well.

Studio A & Studio B/C

In 1961 the architectural firm Allison and Rible was hired to make additional changes to the site. The interiors of Studio A and Studio B/C were altered to accommodate television news production and music recording. Many radio-related features were removed, including most of the sloped seating banks in all three studios; the glass control booths; the overscaled clock; and the large "Stand By" signs.

Studio A

Studio A was originally the largest and most lavishly appointed of the three studios. With 1,050 seats it was equipped to accommodate a large audience listening to a full orchestra for both early CBS radio shows and later for Columbia Records. All of the ground floor seats in Studio A were removed (approximately 75 percent of the original 1,050 seats). The Studio A floor was leveled and reconfigured to include tape editing and playback booths as well as a new stage set.[20] Except for the retention of the balcony (now

[20] *Allison and Rible drawings dated June 17, 1960.*

stripped of finishes and features and with temporary partitions installed) and the balcony railing, the entire studio has been gutted of features. However, within the Studio A building, spatial components such as circulation arteries, room locations, and the northern lobby are all still present.

Studio B/C

Studio B and Studio C were originally two separate and very similar studios, each with a stage, banked seating for 400 people,[21] backstage and props area, a glass control booth, and a client booth for sponsors, all dedicated to live radio shows with audiences.[22]

In 1961, Studio B/C's floors were leveled and replaced by large stage sets, and new interior partitions and other alterations were made for TV news and public programming. Of the original 800 seats, only 226 were retained in Studio B for small audience participation shows.[23] All of audience accommodations in Studio C were removed, and the floor was concreted over and converted to video and central control purposes. The rear portion was converted to a small stage. The second floor retains its original spatial layout, demonstrated in its angled central walkway, located one story above the original angled hallway separating the two studios, B and C, on the ground floor. This second floor also contains original frameless doors to dressing rooms, high gloss black paint on wood and metal trim, and retains some original built-in furniture.

In 1961 Allison and Rible also designed an addition to the east end of Studio B/C which obscured the original façade. The drawing below illustrates the original Parkinson design of the east elevation, which was visible from Gower Street and featured the most fenestration and modernist vocabulary of any of the Parkinson & Parkinson-designed elevations.

There were continued interior alterations throughout the late 1960s and 1970s reflecting changes in broadcast technology and practice. In June of 1968, the acoustical interiors of the studio spaces were updated, facilitating their use for television news. In addition, curtain walls and other interior walls were removed. Based on building permits, changes continued in the studio and office spaces throughout the 1970s and 1980s. The majority of building permits were for acoustical updates, disables access, and partition

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[21] *Los Angeles Times, Sept. 3, 1939.*

[22] *http://bobdfw.com/CBS_looking_back.htm. "Looking Back" by Lorraine Hillman, former Director, News Research, 1957 -1995.*

[23] *Allison and Rible. Drawings (City of Los Angeles Department of Building and Safety and the Owner) dated Jan. 29, 1960.*

renovations. Studio C was eventually modified to house computer and other technical equipment, while Studio B was altered several times to accommodate new technologies in television news broadcasting.

(3) Architects

(a) William Lescaze

William Edmond Lescaze was a Swiss-born American architect. He is considered one of the pioneers of Modernism and Internationalism in American architecture and one of the leading proponents of International Style architecture. Lescaze was educated at one of Europe's leading architectural schools, the Technische Hochschule in Zurich, studying under seminal German architects Karl Moser and Gottfried Semper. He received his degree in 1919, and immigrated to the United States in 1920. He worked for some time at the architectural firm of Hubbell & Benes in Cleveland, Ohio, before setting up his own practice in New York City in 1923. From 1929 to 1934 Lescaze worked with George Howe. Together they designed the seminal Philadelphia Saving Fund Society (PSFS) building in 1932, generally considered the first truly International Style skyscraper, and one of the most important International Style buildings of any type in the United States. It was the widespread success of PSFS as a new type of corporate architecture that drew Paley to Lescaze to work for CBS. In addition to PSFS, Lescaze was represented in the exhibition with several other International Style buildings: the Capital Bus Terminal in New York (1927); the Nursery Building for the Oak Lane Country Day School, Philadelphia (1929); the housing development at Chrystie-Forsyth Streets, New York (1931); and the Hessian Hills School, Croton-on-Hudson, New York (1932). Other important works in the United States include the Lescaze House, New York (1934), which is thought to be the first International Style house in the country; the Kimble Glass Company and factory in New Jersey (1935-37); and the Longfellow Building (1941), the first International Style building in Washington DC.

The Columbia Square Complex buildings are Lescaze's only West Coast buildings. His design for the Columbia Square Complex includes the Commercial/Television Building, Studio A, the Radio Building, and the central courtyard. These components of the complex were completed in 1937.

(b) Earl T. Heitschmidt

Earl Heitschmidt worked with Lescaze on the Columbia Square Complex as the associate architect. Heitschmidt was born in Portland, Oregon in 1894, and trained at the University of Oregon and the Massachusetts Institute of Technology. He worked in firms in Portland, Boston, and New York before coming to Los Angeles and opening his own

practice in 1930. He worked on the Los Angeles Biltmore Hotel with the firm Schultz and Weaver, and also designed the Wrigley Mansion in Phoenix (1929-1930); the renovaltion of Wrigley Field in Los Angeles (1938); Park La Brea (1941-1949); and the Harvey Mudd Master Plan with Edward Durrell Stone (1956).

(c) Parkinson & Parkinson

John and Donald Parkinson were a father-and-son architectural team, practicing together from 1920 to 1945. Together they played a primary role in shaping the character of downtown Los Angeles. Significant commissions include the Campus Master Plan and several noted buildings at the University of Southern California (1919-39); the Los Angeles Memorial Coliseum (1923 and 1930-31); Los Angeles City Hall (1928, with Albert C. Martin and John C. Austin); Bullocks-Wilshire (1929); and Union Station (1939).[24] In Hollywood, the firm designed the Western Avenue Branch of the California Bank on Hollywood Boulevard (1930); and the Broadway Department Store annex, designed in the International Style in 1939, the same year that they were working on Studio B/C at the Columbia Square Complex.

John Parkinson was born in England in 1861. Upon completion of his apprenticeship he immigrated to North America. In 1890, Parkinson moved to Seattle where he opened his first architectural practice. Today, four buildings remain as evidence of his Seattle accomplishments. By the winter of 1893, a serious economic depression had developed in Seattle. With no prospects for work, John Parkinson moved to Los Angeles and opened an architecture office on Spring Street between Second and Third Streets. By 1896, he had designed the City's first Class A fireproof steel-frame structure: the Homer Laughlin Building at Third Street and Broadway. His design for the 1904 Braly Block at Fourth Street and Spring became the first "skyscraper" built in Los Angeles.

Donald B. Parkinson was born in Los Angeles, CA on August 10, 1895. He studied at the Massachusetts Institute of Technology, and in 1920-21 studied art at the American Academy in Rome. Upon his return to Los Angeles, he joined his father's firm.

(d) Allison and Rible

George Allison and Ulysses Rible worked together as Allison and Rible from 1944-1964. He studied architecture at the Carnegie Institute of Technology and the University of

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[24] *Map of Downtown L.A. Parkinson Buildings, The Parkinson Archives LLC. Retrieved July 2007, http://www.parkives.com*

Pennsylvania before moving to Los Angeles in 1931 and starting his career at his uncles' firm. Ulysses Rible studied at the University of Pennsylvania and the University of Southern California. He worked for Parkinson & Parkinson in 1934-1935, and then his own firm from 1935-1943 before partnering with Allison. The Allison and Rible firm specialized in master planning and design for educational campuses. Major commissions include master plans for California State Polytechnic University, San Luis Obispo (1949); and Appleby Hall, Claremont College (1947).

(e) William Pereira

Architect William Pereira is primarily known for his corporate, industrial, and institutional architecture, as well his large-scale master plans. Pereira established his private practice in 1931, launching a career that would span five decades. In the 1950s, Pereira established a partnership with Charles Luckman. In 1958, Luckman left the practice leaving Pereira as the sole principal for the firm. Working in the Corporate Modern, New Formalist, and Brutalist styles, projects designed by Pereira's firm include the USC Master Plan (1960); the Los Angeles County Museum of Art (1964); the Central Library building at UC San Diego (1965); the UC Irvine Master Plan (1965); the Transamerica Tower in San Francisco (1973); and the Los Angeles International Airport Master Plan (1967-1984). Pereira also designed CBS' Television City for William Paley in 1952.

(4) Evaluation of Potential Historic Resources within Study Area

(a) Previous Evaluations

The Columbia Square Complex has been included in numerous surveys of Hollywood's historic resources. The first inventory form for the complex dates to September of 1979 as part of a survey completed by the Hollywood Revitalization Committee. At that time it was assigned a status code of "3," which translates to a "3S" in the current California Historical Resources Status Codes. The code of "3S" in the State Historical Resources Inventory indicates that the property "appears eligible for the National Register as an individual property through survey evaluation."[25] This evaluation was upheld in all subsequent survey reviews, including the 1984 Community Redevelopment Agency (CRA) survey; in the updated Office of Historic Preservation Historic Resources Inventory in 1997; and in the 2003 CRA survey update. The most recent survey update is the 2008 CRA Historic Resources Survey, which identified Columbia Square as a historic district,

[25] *The Community Redevelopment Agency Survey of 1984. California Historic Resources Inventory, December 11, 2008.*

and assigned it a Status Code 3S. It should be noted that alterations to the complex had been made prior to the first evaluation; no substantial changes to the structures have taken place following the initial assessment of eligibility.

On March 13, 2009, the Complex was declared a City of Los Angeles Historic-Cultural Monument by the City Council. The City Council's designation concurred with the Cultural Heritage Commission and the Office of Historic Resources staff recommendation that additions dating from 1939-1940 by the firm of Parkinson & Parkinson and alterations and additions from 1961 by the firm of Allison and Rible be encompassed within the proposed nomination, but defined these as non-character-defining features. The staff report stated that Studio B/C lacks sufficient integrity as it had been entirely altered for use as studio space in recent history.

(b) Historic Designations

A property may be designated as historic by national, state, and local authorities. In order for a building to qualify for listing in the National Register, the California Register, or as a locally significant property in the City of Los Angeles, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

(i) National Register of Historic Places

Based on the Historic Resources Technical Report (refer to Appendix C of this EIR), the Columbia Square Complex is significant under Criterion A of the National Register of Historic Places for its association with the development of radio and television as major industries in the United States, and specifically Columbia Broadcasting Systems, led by William Paley, as a leader in the industry. This context has been identified by the National Park Service as significant for Hollywood, and a number of entertainment industry resources have been designated under Criterion A. The period of significance extends from 1938 when facilities at Columbia Square were first established through 1952 when CBS moved the majority of their television production facilities to Television City on Beverly Boulevard.

The majority of the Columbia Square Complex also appears to be significant under Criterion C as an excellent example of International Style architecture in Los Angeles and a representative work of master architect William Lescaze. While alterations have been made continually to both interiors and exteriors over the life of the Complex, the Complex overall retains its ability to convey its historic significance.

Columbia Square may also be significant under Criterion B for its association with significant people. Columbia Square is primarily associated with William Paley, the founder and former chairman of CBS and one of the innovators of modern broadcasting. Paley built CBS into a global communications corporation, and Columbia Square was built under his guidance and with his vision. Paley was also influential in the development of broadcast news, and under his leadership CBS News became one of the world's preeminent news organizations, with the industry's leading talent including Edward R. Murrow, Eric Sevareid, and Howard K. Smith.

Other important people associated with Columbia Square include D.W. Thornburgh, who was vice-president of CBS until 1949 and responsible for expanding network coverage at Columbia Square from two to forty programs per week. Countless entertainment figures in the radio, television and recording industries worked at Columbia Square, including Jack Benny, Bing Crosby, Ed Wynn, Lucille Ball, Art Linkletter, Tommy Dorsey, Miles Davis, Janis Joplin, and Bob Dylan.

Overall, the Complex retains integrity of location, design, materials, workmanship, feeling, and association despite alterations to the ground floor exterior, interior of Studio A, exterior and interiors of Studio B/C, and some of the interior offices. The exterior appears largely as it did when construction was completed in 1938. Much of the interior circulation space, including the windows, glass block panels, elevator lobby, corridors, walls, railings, and stairwells still retain their original materials and continue to convey their quality of workmanship and original design. The feeling and association that this was an extremely modern building constructed for CBS to broadcast radio and television is clearly conveyed by walking through the circulation spaces. Many of the alterations that have occurred to the Lescaze-designed buildings could be satisfactorily reversed in an adaptive reuse or restoration program.

While Studio B/C is an important component of the overall design of the site, it is lesser in provenance and integrity than the Lescaze-designed buildings. Lescaze's design brought International Style Modernism to commercial architecture in Los Angeles, while Parkinson & Parkinson were contributing to the already established vision for the site. While similar alterations occurred over time throughout the complex, the 1961 and 1968 changes to Studio B/C negatively impact the building's integrity of design, materials, and workmanship. Integrity of design was particularly compromised by Allison and Rible's full-length addition along the east elevation, filling in many window openings with brick, introducing new openings, and a reconfiguration of the interior spaces. The 1968 alterations by William Pereira further compromised the Sunset façade, filling in the area beneath the entrance canopy which obscured or removed the original glass block and all the openings on the south façade. Subsequent modifications to remove theater stages, seating, and other features from the interior of Studio B/C further compromised its historic integrity.

Based on the above, the Complex as it exists today qualifies for listing in the National Register of Historic Places. California Register of Historical Resources

The Columbia Square Complex has been evaluated as eligible for listing in the California Register because it is eligible for the National Register and meets the Criteria 1 and 3 and may also be eligible under Criterion 2. The Columbia Square Complex is eligible for listing in the California Register under Criterion 1 for its association with the development of radio and television in the United States. It is an important resource that was instrumental in the development of Hollywood as a national center of radio and television production. The Columbia Square Complex is also eligible for listing in the California Register under Criterion 3 as an excellent example of International Style architecture in Los Angeles and as an example of renowned architect William Lescaze.

Columbia Square may also be significant under Criterion 2 for its association with William Paley, the founder and former chairman of CBS, D.W. Thornburgh, vice-president of CBS until 1949, and countless entertainment figures in the radio, television and recording industries worked at Columbia Square, including Jack Benny, Bing Crosby, Ed Wynn, Lucille Ball, Art Linkletter, Tommy Dorsey, Miles Davis, Janis Joplin, and Bob Dylan.

Based on the above, the Complex as it exists today qualifies for listing in the California Register.

(ii) City of Los Angeles Historic-Cultural Monument

The Columbia Square Complex was nominated as a Historic-Cultural Monument by Hollywood Heritage on September 9, 2008. The Cultural Heritage Commission voted to take the nomination under consideration at its October 16, 2008 meeting, and completed a tour of the complex on November 20, 2008. The nomination was recommended for approval by the Cultural Heritage Commission on December 18, 2008, and formally approved by the City Council at their March 13, 2009 hearing. The City Council found that:[26]

1. The building "embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction" as an example of international Style architecture.

[26] *The HCM evaluation is taken from the City of Los Angeles Office of Historic Resources Staff Report to City Council, January 27, 2009.*

2. The building is associated with a master builder, designer, or architect, as a work by the architect William Lescaze.

3. The property reflects "the broad cultural, economic, or social history of the nation, State or community" for its association with the development of radio and television broadcasting in Hollywood.

4. The property is identified with historic personages, with several prominent figures of the entertainment industry of Hollywood.

The City Council concurred with the Cultural Heritage Commission and the Office of Historic Resources staff recommendation that additions dating from 1939-1940 by the firm of Parkinson & Parkinson and alterations and additions from 1961 by the firm of Allison and Rible be encompassed within the proposed nomination, but defined these as non-character-defining features. The staff report states:

> *"Built after the original complex designed by Lescaze in 1938, these changes are encompassed by the Studio B/C sections of the subject property located in the upper northeastern portion of the property. Although the site of some significant radio programming by notable figures, these buildings lack sufficient integrity, having been entirely altered for use as studio space in recent history."*[27]

c. Archeological Resources

The project site is located in a highly urbanized area subject to disruption throughout the years. Recent project-specific geotechnical studies have determined that there is approximately 2.5 to 5.5 feet of recent fill under the current development on the site.[28] Holocene alluvium underlies the fill.

Results of the cultural resources records search conducted through the California Historical Resources Information System South Central Coastal Information Center (CHRIS-SCCIC) at California State University, Fullerton, indicate that there are no recorded archaeological resources located within the project site. The search also revealed that one cultural resource investigation, conducted by Jones & Stokes Associates for the Nextlink

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[27] *City of Los Angeles Office of Historic Resources Staff Report to City Council, January 27, 2009.*

[28] *Geocon Inland Empire, Inc., 2006, Proposed Mixed-Use High-Rise Development 6121 Sunset Blvd., 1538 El Centro Ave., 1567 Gower St., & 6110-6130 Selma Ave., Hollywood Area, City of Los Angeles, California. Prepared for Molasky Pacific, LLC, Santa Monica California.*

Fiber Optic Project in 2000, included a portion of the project site.[29] No archaeological resources were identified in the Jones & Stokes investigation. Eight additional cultural resource investigations have been conducted within a half-mile radius of the project site. The majority of these recorded surveys were for cell phone towers. The closest recorded archaeological resources identified in these eight reports occur approximately 0.25 mile from the site and consist of a cluster of historical-period artifacts found during monitoring of construction that occurred at the intersection of Sunset and Vine. These deposits date to approximately 1900 to 1940 and appear to have been associated with nearby residences and renovations to the TAV Theatre complex. The deposits did not extend deeper than approximately 1.4 m (4.6 feet) below the modern ground surface.[30] Results of the cultural resource records search through the CHRIS-SCCIC, and the Sacred Lands Search through the NAHC also revealed that there are no known burials or Native American cultural resources within the Project site or within a half-mile radius of the Project site.[31]

d. Paleontological Resources

A project-specific paleontological records search through the Natural History Museum of Los Angeles County was conducted in order to determine potential impacts of the proposed project on paleontological resources.[32] Results of the paleontological records search indicate that there are no recorded fossil localities inside of the project site boundaries. The closest vertebrate fossil localities are located approximately one mile east-northeast of the Project site. These consist of the remains of Pleistocene horse, camel, bison, and mastodon. Other sites within the wider project vicinity have produced Pleistocene fossils at depths of five to twelve feet below the ground surface. The Project site is underlain by Pleistocene-age sediments, although any paleontological resources that may have existed at the surface at one time have likely been disturbed by past development activities. Therefore, the uppermost sediments are not likely to contain fossils.

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[29] *Sara M. Atchley, 2000, Cultural Resources Investigation for the Nextlink Fiber Optic Project, Los Angeles and Orange Counties, California, Jones & Stokes Associates, 2600 V Street, Sacramento, CA 95818. Document on file at the California Historical Resources Information System South Central Coastal Information Center, California State University, Fullerton.*

[30] *McKenna, Jeannette, 2002, Site Form for 19-00354, TAV Celebrity Theatre Complex. Document on file at the California Historical Resources Information System South Central Coastal Information Center, California State University, Fullerton.*

[31] *Native American Heritage Commission, January 3, 2007.*

[32] *Natural History Museum of Los Angeles County, January 11, 2007.*

3. Project Impacts

a. Methodology

In order to identify and evaluate potential historic resources located within the site, a multi-step methodology was utilized. Record searches to identify previously documented historic resources were conducted and previous evaluations were reviewed. Site inspections were made to document existing conditions, identify character-defining features of those properties evaluated as significant, and define the historic resources study area. A reconnaissance survey of the property, including photography and background research, was then made. Additional background and site-specific research was conducted in order to evaluate historic resources within their historic context. National Register of Historic Places, California Register of Historic Places and the local city criteria were employed to assess the significance of the properties.

To address potential impacts associated with archeological and paleontological resources, records searches were conducted. These record searches, together with an evaluation of the existing conditions and previous disturbances within the site, the geology of the project site and anticipated depths of grading were used to determine the potential for uncovering of such resources.

b. Significance Thresholds

(1) CEQA and Historic Resources

A building is considered historically significant, and therefore an "historical resource" under CEQA, if it falls into one of three historical resource categories as defined by Section 21084.1 of the Public Resources Code. Mandatory historical resources are sites listed in or eligible for listing in the California Register of Historical Resources. Presumptive historical resources include sites officially designated on a local register or sites found significant by the State Historic Preservation Officer (SHPO) under Section 5024.1(j) of the Public Resources Code. Discretionary historical resources are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources. Properties designated by local municipalities can also be considered historical resources. A review of properties that are potentially affected by a project for historic eligibility is required under CEQA.[33]

[33] *California CCR Section 21084.1.*

The impacts of a project on a historical resource may be considered an environmental impact. Section 21084.1 of the California Public Resources Code states:

"A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources."

Section 15064.5(b) of the CEQA Guidelines states that a project involves a "substantial adverse change in the significance of a historical resource" when one or more of the following occurs:

- 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 would be materially impaired.

- The significance of a historical resource is materially impaired when a project results in any of the following:

    - 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.

    - Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant.

    - Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

The Secretary of the Interior's Standards for Rehabilitation (Standards) are codified at 36 Code of Federal Regulations (CFR) Section 67.7. In most circumstances, the Standards are relevant in assessing whether there is a substantial adverse change under

CEQA. Section 15064.5b(3) of the CEQA Guidelines states in part that ". . . a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historic resource," and therefore may be considered categorically exempt. The Standards apply to both the exterior and interior of historic buildings, as well as encompassing related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction.

(2) City of L.A. CEQA Thresholds Guide

(a) Historic Resources

The following significance thresholds are applied to the subject project as set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, which states that a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historical resource. A substantial adverse change in significance occurs if the project involves any of the following:

- Demolition of a significant resource.
- Relocation that does not maintain the integrity and significance of a historical 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.
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Based on these factors, a project would have a significant impact on historic resources, if:

- The project would demolish, destroy, relocate, or alter a historical resource such that the significance of the historical resource would be materially impaired; or
- The project would reduce the integrity or significance of important resources on the site or in the vicinity.

(b) Archaeological Resources

The *City of L.A. CEQA Thresholds Guide (2006),* states that a project would normally have a significant impact on archaeological resources if it could disturb, damage, or degrade an archaeological resource or its setting is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100 years-old and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

In addition to this guidance provided by the City of Los Angeles, the CEQA recognizes that historical resources, which include but are not limited to archaeological resources, are part of the environment, and a project that "may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment" (Public Resources Code Section 21084.1). For purposes of CEQA, a historical resource is any object, building, structure, site, area, place, record, or manuscript listed in or eligible for listing in the California Register of Historic Resources (Public Resources Code Section 21084.1).

The factors established by the City of Los Angeles reflect the intent of the California Register of Historic Resources (CRHR) criteria and address the criteria established for defining unique archaeological resources as set forth in CEQA, with one exception. As such, the following is also used to assess the potential significance of a unique archaeological resource;

- Involves important research questions that historical research has shown can be answered only with archaeological methods.

Based on the above, the project would have a significant impact on archaeological resources if:

- Project activities would disturb, damage, or degrade a unique archaeological resource or an archaeological historical resource, or setting of the resource.

(c) Paleontological Resources

The *City of L.A. CEQA Thresholds Guide* (2006), states that the determination of the significance of paleontological impacts shall be made on a case-by-case basis, considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
- Whether the paleontological resource is of regional or statewide significance.

Based on these factors, the Project would have a significant impact on paleontological resources, if:

- The Project would result in the permanent loss of, or loss of access to, a paleontological resource of regional or statewide significance.

c. Project Design Features

As part of the project, three of the four existing Columbia Square Complex buildings (or approximately 105,510 square feet of the 136,233-square-foot Complex) would be rehabilitated to provide for approximately 91,110 square feet of office uses and 14,400 square feet of retail and restaurant/bar uses. Rehabilitation of the Radio Building (1st Wing), Studio A (2nd Wing), and the Commercial/Television Building (3rd Wing), would conform to the Secretary of the Interior Standards for Rehabilitation. The functionality of the rehabilitated structures would be fully integrated with that of the other structures proposed on-site, and extensive landscaping, open space, and pedestrian links would be introduced to connect and integrate all elements of the project. To this end, the project has been designed to acknowledge the history of the site while building on it for the future. The fourth building that houses Studio B/C would be demolished and replaced by the 14-story office building and courtyard.

The rehabilitation of the approximately 105,510 square feet (91,110 square feet for office uses and 14,400 square feet for retail and restaurant/bar uses) of the existing 132,233 square foot Columbia Square Complex may be the subject of a separate application by the Applicant to the City. The Applicant is independently committed to rehabilitating the approximately 105,510 square foot portion of the existing Columbia Square Complex to the Secretary of Interior Standards regardless of the City's determination on this proposed project (i.e., whether the City approves this larger proposed

project or not, the Applicant plans to rehabilitate a portion of the existing buildings). In an effort to be conservative, this Draft EIR analyzes the full impacts of the proposed project, which includes rehabilitation of the approximately 105,510 square foot portion of the existing Columbia Square Complex. Separate analysis of the 105,510 square foot development will also be conducted by the City for the other application for any required approvals to rehabilitate the existing Columbia Square Complex.

As part of the project, up to 190,000 cubic yards would be exported to provide for subterranean parking. The approximate depth of excavation for the subterranean parking facility would be approximately 35 to 40 feet.

d. Analysis of Project Impacts

(1) Historical Resources

As discussed above and described in detail in the Historic Resources Technical Report (Appendix C of this EIR), the Columbia Square Complex meets the criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a Los Angeles Historic-Cultural Monument. Therefore, it is considered a historical resource under CEQA. Specifically, the Columbia Square Complex is significant under criterion A of the National Register of Historic Places for its association with the development of radio and television as major industries in the United States and under criterion C as an excellent example of International Style architecture in Los Angeles and a representative work of master architect William Lescaze. In addition, the Columbia Square Complex is eligible for listing in the California Register under Criterion 1 for its association with the development of radio and television in the United States and under Criterion 3 as an excellent example of International Style architecture in Los Angeles and as an example of renowned architect William Lescaze. As discussed above, the Columbia Square complex was approved as a Historic-Cultural Monument by the City of Los Angeles as the building was determined to embody the distinguishing characteristics of International Style architecture, the building was is associated with a master architect William Lescaze, the property is associated with the development of radio and television broadcasting in Hollywood, and the property is identified with several prominent figures of the entertainment industry of Hollywood. . . . . .

The project proposes to retain three of the four buildings and the Sunset Courtyard which comprise the Columbia Square Complex. The Radio Building, Studio A, the Commercial/Television Building, and the Sunset Courtyard would be rehabilitated according to the Secretary of the Interior Standards for Rehabilitation using existing documentation and photographs. The canopy, which existed between the Radio Building and the Commercial/Television Building in the original Lescaze design, would be

reconstructed for use as a pedestrian portal connecting the Sunset Courtyard to the northern portion of the site. The fourth building, which houses Studio B/C, would be demolished and replaced by a 14-story office building. The northern portion of the site would be developed with a seven-story hotel building and residential structures ranging from eight to forty stories. Therefore, three types of impacts were considered: appropriate rehabilitation of the Lescaze buildings and the Sunset Courtyard; demolition of Studio B/C; and new construction on the site including the redesign of the Sunset Courtyard.

(a) Analysis of Proposed Rehabilitation

The designation of the Columbia Square Complex as a Historic-Cultural Monument in accordance with Chapter 9, Article 1, of the City of Los Angeles Administrative Code ("LAAC") means that any future construction activities involving the subject property are regulated in accordance with Section 22.171.14 of the LAAC. The purpose of the designation is to prevent significant impacts to a Historic-Cultural Monument through the application of the standards set forth in the LAAC. Without the regulation imposed by way of the designation, the historic significance and integrity of the subject property could be lost through incompatible alterations and new construction and the demolition of irreplaceable historic structures. The Secretary of the Interior's Standards of Rehabilitation are expressly incorporated into the LAAC and provide standards concerning the historically appropriate construction activities which would ensure the continued preservation of the subject property.[34]

The project proposes to rehabilitate the majority of the complex (Radio Building, Studio A, the Commercial/Television Building, and the Sunset Courtyard). The intent of the rehabilitation program is to restore the exteriors of the remaining buildings and the Sunset Courtyard to their appearance as designed by Lescaze. The rehabilitation plans would be based on original drawings, historic photographs, and existing conditions, and identified character-defining features on both the interior and exterior would be retained. Later additions to the south elevation of Studio A (facing the Sunset Courtyard) would be removed, but original fabric from the Lescaze design would be substantially retained and rehabilitated, and the original portal canopy extending from Studio A separating the Sunset Courtyard and the north end of the site would be re-opened and repurposed for pedestrian uses. A detailed discussion of how the proposed rehabilitation conforms to each of the Standards is provided in the Historic Resources Technical Report (Appendix C of this EIR). Thus, in accordance with CEQA, significant impacts associated with proposed rehabilitation of existing structures would not occur.

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[34] *City of Los Angeles Office of Historic Resources Staff Report, January 27, 2009.*

(b) Analysis of Proposed Demolition

While the majority of the Complex would be preserved and adaptively reused, the demolition of Studio B/C constitutes a significant adverse change to the resource as it exists today, removing approximately 25 percent of the existing square footage and the corresponding historic fabric. Any remaining character-defining features, materials, and examples of craftsmanship within Studio B/C would be lost. The configuration and important spatial relationships within the Complex would no longer exist, in particular the inter-relationships between the four buildings that were originally integrated on the interior and exterior to coordinate television and radio function within the period of significance.

Studio B/C is a physical manifestation of the development of the site for increased radio and television production; its removal would impact the Complex's ability to convey its historic development. Specifically, with removal of Studio B/C, the Complex would have a smaller footprint and would not as adequately visually represent the changes in radio and television history over time. In addition, the proposed removal of Studio B/C does not conform to the Secretary of Interior's Standards and would result in a significant impact that cannot be mitigated. It should be noted that while the removal of Studio B/C is significant, the remaining portions of the Complex would continue to be eligible for listing in the National Register of Historic Places and the California Register of Historic Places because the remaining portions of the Complex convey both their historic associations in terms of use, and their architectural associations with William Lescaze.

(c) Analysis of Proposed New Construction

Because the proposed project includes new construction adjacent to an historical resource, three types of impacts were examined in the Historic Resources Technical Report: impacts related to *construction methods*, impacts related to the *design* of adjacent new construction, and the impacts related to the *location, scale, and massing* of new construction.

(i) Construction Methods

Construction methods have the potential to directly affect the historic materials of the Columbia Square Complex. Standard 5 of the Secretary of the Interior's Standards states that "distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property would be preserved." Damage caused by adjacent new construction could potentially violate this Standard, resulting in an adverse impact. Methods used for the new construction should not damage the historical resource. In particular, construction involving excavation, such as excavation required for the subterranean parking, might cause vibration and undermine the seismic conditions of the project site. In addition, construction of the foundation and subterranean parking levels has

the potential to disturb any archaeological resources that may be present on the site. Any archaeological resources discovered on the site would be treated in accordance with Federal and State regulatory requirements, as described below.

(ii) Design of the New Construction

The design of the new construction also has the potential to disrupt or distract from the historic character of the complex. Design issues are referenced in Standards 9 and 10 of the Secretary of the Interior's Standards. Standard 9 requires that new construction be "differentiated from the old" and "compatible" with the historical resource. Guidelines to implementing the Standards further state that scale, massing, height, materials, and color of new construction should be visually compatible with the character of the adjacent buildings, and should preserve the relationships between the buildings and the landscape features. This generalized language allows for flexibility to fit the Standards to local conditions and specific circumstances, and there is a recent trend to use clearly modern architecture in historic settings to differentiate it from the existing architecture. The most successful additions of new architecture in historic settings do not simply mirror the surface appearance of the existing buildings, but respond to, and attempt to reveal underlying principles in the adjacent historic architecture.

While the designs for the new construction in the proposed project are still in the conceptual stage, the current plans indicate that the new construction would be clearly differentiated from the existing historic structures. Architectural materials utilized for the new office buildings would likely include spandrel glass, clay/terracotta rain screen tiles, stainless steel cable balcony railing, tempered glass balcony railing, and architectural smooth finish concrete. The use of smooth finish concrete is planned for the podium structure, which is consistent with the original cladding on the historic buildings. The introduction of other building materials on the site that are not compatible with the historic structures are consistent with advances in building technology, are necessary to create the desired size and scale of the new buildings, and reflect the needs of the new residential and commercial uses on the site that differ from the original industrial spaces.

The design of the new buildings is clearly contemporary, but the architects propose to integrate several references to Lescaze's International Style design and proportions of the vertical Radio Building in their plans. The height of the podium was specifically designed to be equivalent to the height of the Radio Building. The schematic designs indicate that the horizontal banding created by the windows in the historic Radio Building would be referenced in the design of the new office tower, which would employ alternating bands of concrete and wrap-around window openings as well as in the design of the podium, which introduces spandrel glass installed on a horizontal bias. These design elements are intended to reference the historic windows, and also to introduce an element

of horizontality to the buildings. In addition, Lescaze's use of pilotis and a recessed ground floor are strategically recalled in the design of the new buildings, in particular at the entrance to the Office Tower on Gower, and the hotel porte-cochere on El Centro. These elements introduced to attempt a similar light touch on the ground as Lescaze intended for his buildings.

However, there are significant design elements that were determined to be incompatible with the adjacent historic structures. The contemporary design and introduction of new materials contrast instead of complement the existing historic buildings. The extensive use of glass, particularly in the design of the residential building, creates a transparent façade which does not continue the solid to void ratio that was created in the historic buildings. The conceptual design of the restaurant building on that faces El Centro Avenue indicates an elaborate treatment of the façade, which is in contrast with the simple, unadorned historic facades.

The Sunset Courtyard would be affected with the new design elements that are proposed for the site. The Sunset Courtyard was a prominent feature of the original Lescaze design. The proposed project would include modifications to the courtyard, including loss of auto access (not present since the 1940s), changes to the landscaping, and the addition of pedestrian access through the courtyard to the northern end of the project site. The conceptual design for the Sunset Courtyard indicates that the additions by Parkinson & Parkinson, Allison and Rible, and William Pereira to the south elevation (facing the Sunset Courtyard) of Studio A would be removed. The overall width of the courtyard at Sunset Boulevard is approximately 84 feet. As such, the removal of this section of the north elevation would eliminate approximately 50 percent (or 40 feet) of the existing building frontage along Sunset. The current plans indicate that the Sunset Courtyard would be returned to its appearance as designed by Lescaze using existing plans and historic photographs. Remaining historic fabric would be preserved, and the portal connecting the courtyard with the north end of the site will be recreated to its original dimensions. In the absence of physical historic materials, Lescaze's design intent would be referenced in the reintroduction of a curvilinear traffic pattern which would be readapted to pedestrian use. Thus, impacts to the Sunset Courtyard would be less than significant.

Standard 10 requires that new construction 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." As planned, the new buildings are designed as separate elements that could be removed in the future, returning the Complex to its original 1938 configuration, prior to the construction of Studio B/C.

(iii) Size, Scale, and Massing of New Construction, Relative to Existing On-site Resources

In addition to requiring compatibility of design, Standard 9 also states that new construction should be compatible in "size, scale and proportion, and massing to protect the integrity of the property and its environment." The proposed project is not compatible in size and scale with the adjacent historic buildings on-site or the historic streetscape along Sunset Boulevard. The Lescaze-designed Radio Building, the tallest of the remaining historic buildings on the site, is five stories tall and approximately 78 feet in height; Studio A comprises two stories and 43 feet in height; and the Commercial/ Television Building is one story with a mezzanine level at 22 feet in height. The project's proposed restaurant building at two stories (24 feet) and the Hotel at seven stories (75 feet) approximate the heights of the historic complex. However, they are only a part of the overall plan.[35] The primary additions to the site include an office tower and the residential tower on top of the hotel component. The office tower, which would be located immediately north of the Commercial/Television Building, would include14 stories and would be approximately 204 feet in height (or up to 260 feet in height when including the helipad and architectural features). The residential tower, located on the northwest corner of the site, would include 40 stories and would be approximately 447 feet in height (or up to 512 feet in height when including a helipad and architectural features). The verticality of these proposed new buildings introduces a new massing element to the horizontal nature of the existing buildings on the site. In addition, the size and scale of the new office tower would significantly alter the historic spatial relationships and the experience of the Complex from its public spaces.

The location of the office tower would also have a significant impact on the historic site, in particular the views of the complex from Sunset Boulevard and Gower Street, and due to its immediate adjacency to the Lescaze-designed Commercial/Television Building. As proposed, the distance between the Commercial/Television Building and the proposed office tower would be 6 feet at the narrowest point, and 12 feet at the widest. This does not provide an adequate setback between buildings and would constitute a significant impact.

The location of the residential tower at the rear of the property allows the Radio Building and Studio A to retain their presence on Sunset Boulevard. However, the new buildings would alter the existing relationship of the historic buildings to the street with the introduction of prominent vertical massing.

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[35] *All building dimensions per Johnson Fain International, Inc. February 24, 2009 Columbia Square Axonometric Drawing and Site Plan. Heights indicate ground floor finish floor to the roof of the last habitable floor.*

(iv) Size, Scale, and Massing Relative to Resources Adjacent to the Site

The size, scale, and massing of the proposed project would also impact existing historic resources adjacent to the project site. The residential neighborhood located between Gower and Gordon Streets and Carlton Way and Sunset Boulevard contains a number of contributors to the Selma-La Baig Historic District. Consisting primarily of single-family residences, the Selma-La Baig Historic District has been determined eligible for listing in the National Register, and many of the contributing structures are currently listed in the California Register.

In addition to the Selma-La Baig Historic District, the Sunset corridor to the east and west has a number of identified historic resources, including the Palladium, Warner Brothers Studio, and the Earl Carroll Theater. Such resources add to the general character of the area and contribute to its historical context associated with the entertainment industry in Hollywood. The introduction of the proposed new buildings on the Columbia Square site would have an adverse impact on these adjacent resources. The new buildings are not compatible in design, size, scale, or massing with the existing resources, and represent a vertical intrusion to the neighborhood. The existing resources present a low-density, horizontal frontage along Sunset, which would be disrupted with the addition of the Office and Residential Towers at Columbia Square.

For the reasons stated above, the proposed new construction does not conform to the Secretary of Interior's Standards and would result in significant impacts that cannot be mitigated.

(2) Archaeological Resources

Given the lack of reported finds described above and disturbance of the ground surface over time, archaeological sensitivity of the project site is considered to be low. In addition, given the construction history of the project site and known levels of fill, shallow or surficial archaeological resources that may have existed on the project site have likely been destroyed. If, however, a unique archaeological resource were discovered during construction of the project, work in the area would cease and deposits would be treated in accordance with Federal and State regulatory requirements, including those set forth in California Public Resources Code Section 21083.2. Thus, impacts to archaeological resources would be less than significant.

As indicated above, results of the cultural resource records search through the CHRIS-SCCIC, and the Sacred Lands Search through the NAHC revealed that there are no known burials or Native American cultural resources within the Project site or within a half-mile radius of the Project site.[36] If such resources are encountered during construction excavation and/or grading activities, all work shall cease in that area. Any discovery of human remains will be treated in accordance with Section 5097.98 of the Public Resources Code (PRC) and Section 7050.5 of the Health and Safety Code. With implementation of Mitigation Measure C-8, below, potential impacts related to archaeological resources would be reduced to a less than significant level.

(3) Paleontological Resources

As indicated above, the project site is underlain by Pleistocene-age sediments, although any paleontological resources that may have existed at the surface at one time have likely been disturbed by past development activities. Therefore, the uppermost sediments are not likely to contain fossils. During deeper excavations, such as those associated with construction of the subterranean levels of the parking facility, there is a potential that fossil vertebrate materials may be encountered in the deeper Pleistocene-age sediments. If such resources were encountered during excavation and grading activities, all work would cease in that area. Any discovery of paleontological resources would be treated in accordance with City guidelines for identification, evaluation, disclosure, avoidance or recover, and curation, as appropriate. With implementation of Mitigation Measure C-9, below, potential impacts related to paleontological resources would be reduced to a less than significant level.

4. Cumulative Impacts

The analysis of cumulative impacts on historic resources involves an evaluation of whether the cumulative impacts of the project and related projects in the area, when taken as a whole, would substantially diminish the number of existing resources within the same context, or of similar property types. Specifically, cumulative impacts would involve projects affecting local resources with the same level or type of designation or evaluation, projects affecting other structures located within the same National Register District, or projects that involve resources that are significant within the same context as resources associated with the project.

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[36] *Native American Heritage Commission, January 3, 2007.*

As discussed above, the residential neighborhood immediately east and northeast of the project, located between Gower and Gordon Streets and Carlton Way and Sunset Boulevard, contains a number of structures that are contributors to a historic district known as the Selma-La Baig Historic District. A few related projects are located in close enough proximity to the project site (e.g., Related Projects No. 60) so as to potentially contribute to cumulative impacts to the adjacent Carlton/Harold Way/Selma/La Baig neighborhoods. As such, the project in combination with related projects may result in a significant cumulative historic impact to the adjacent Selma-La Baig Historic District.

In addition to the Selma-La Baig Historic District, the greater project area is known for a number of historic resources, notably the Hollywood Boulevard Commercial and Entertainment Historic District and the Hollywood Walk of Fame. The Hollywood Historic Commercial and Entertainment Historic District is listed on the National Register and contains 57 contributing features; the Walk of Fame extends along Hollywood Boulevard between La Brea Avenue and Gower Street as well as along Vine Street between Yucca Street and Sunset Boulevard.37 Additional resources in the vicinity include the Hollywood Palladium, Warner Brothers Studio, and the Earl Carroll Theater. Such resources add to the general character of the area and contribute to its historical context associated with the entertainment industry in Hollywood.

As indicated in Section III, General Description of Environmental Setting, of this Draft EIR, 94 related projects have been identified within the project study area. As shown in Figure III-1 in Section III, General Description of Environmental Setting, many related projects are located in close proximity to the project site including many that are highly concentrated along Vine Street between Sunset Boulevard and Franklin Avenue, and along Hollywood Boulevard between La Brea Avenue and the 101 Freeway. Collectively, the cumulative projects near the site propose a variety of residential (apartments, condominiums, senior housing, etc.), office, hotel, retail, restaurant, and entertainment uses, consistent with existing uses in the area. Some of these related projects impact (directly or indirectly) identified historic resources in Hollywood, including those indicated above. These related projects can be further reduced to those relevant projects that impact a resource of like character (based on use, context, building type, and evaluation/significance) to the project such as Related Project No. 94 (the Capitol Records Tower project located adjacent to the Hollywood Boulevard District) located at 1750 Vine Street, and Related Project No. 36 (the Hollywood & Vine Mixed Use Project adjacent to the Hollywood Boulevard District with a proposed high-rise office building, within sight of project site) located at 6250 Hollywood Boulevard. In addition, Related Project No. 93 is

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[37] *Community Redevelopment Agency of the City of Los Angeles, Hollywood Redevelopment Plan Amendment Final EIR, February 2003.*

foreseeable to the north of the historic Hollywood Palladium venue, directly west of the project site.

As described above, the characteristic configuration, spatial relationships and setting of the Columbia Square Complex would be altered and a substantial amount of historic fabric would be adversely affected with the demolition of Studio B/C as proposed by the project. In addition, the design, size, scale, and massing of proposed new development would significantly alter the historic relationships with the Columbia Square Complex and nearby historic resources. Thus, in accordance with CEQA, implementation of the project would result in a significant impact to historic resources that cannot be mitigated. Accordingly, the project's impact to historic resources in combination with anticipated impacts to Hollywood entertainment industry-related historic resources that would occur with implementation of the related projects would result in a significant unavoidable adverse impact to historic resources. Therefore, the project's significant unavoidable historic impact in combination with historic impacts generated by related projects would result in a significant cumulative historic impact.

With regard to potential cumulative impacts related to archeological and paleontological resources, the project vicinity is located within an urbanized area that has been substantially disrupted over time. In the event that such resources are uncovered, each related project would be required to comply with regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering of paleontological resources and archeological resources.

5. Mitigation Measures

The project, as proposed, constitutes a significant adverse change in a historic resource. Demolition of a portion of the Columbia Square Complex (Studio B/C) cannot be mitigated to a level of insignificance. In addition, the location, design, size, scale and massing of new development would significantly alter the historic relationships with the Columbia Square Complex and nearby historic resources. However, the following mitigation measures would reduce impacts on historic resources:

Mitigation Measure C-1: A Historic Structures Report (HSR) shall be prepared which includes all the components of the Columbia Square Complex. The HSR shall provide complete documentary, graphic, and physical information about both the property's history and its existing condition. In addition, the report shall include appropriate methods for treatment of the existing historic fabric, outlines a recommended scope of work, and provides information and recommendations for

further treatment. This report shall be prepared according to the National Park Services *Preservation Brief 43: The Preparation and Use of Historic Structures Reports*.[38]

Mitigation Measure C-2: The Complex should be photographed to the Historic American Building Survey (HABS) level 1 standards prior to any demolition, abatement or rehabilitation work. Copies of the documentation shall be given to Hollywood Heritage and the Los Angeles Public Library. Existing condition and/or measured drawings shall be included.

Mitigation Measure C-3: The rehabilitation of the remaining portions of the Columbia Square Complex shall follow the Secretary of the Interior's Standards and have specifications for the treatment of character-defining features as identified in the HSR contained in the general specifications for the project. The specifications would include (but are not limited to), sections for treatment of historic fabric; quality control; substitution procedures; demolition; selective removal and storage of historic materials; protection, patching, and cleaning; and determination of repair options and potential replacement of severely deteriorated features. Materials conservation plans shall be incorporated into the plans and specifications if necessary.

Mitigation Measure C-4: All original character-defining features on the exterior of the Lescaze-designed components shall be retained and rehabilitated according to the Secretary of the Interior's Standards in order to ensure that all remaining historic fabric is appropriately treated and returned to its original appearance wherever possible.

Mitigation Measure C-5: Structural engineers with expertise in historic preservation shall provide a shoring design solution, if necessary, to protect the Columbia Square Complex from construction procedures and mitigate the possibility of settlement due to the removal of adjacent soil. Structural engineers shall also evaluate the potential impacts of the proposed subterranean parking adjacent to the historic foundations. Temporary seismic movement during new construction shall also be analyzed, and recommendations to allow for this movement shall be provided. This plan shall be part of the HSR and reviewed and approved by the City of Los Angeles Office of Historic Resources.

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[38] *U.S. Department of the Interior, National Park Service. "Preservation Brief 43: The Preparation and Use of Historic Structures Reports," 2005. http://www.nps.gov/history/hps/tps/briefs/brief43.htm*

Mitigation Measure C-6: The project team shall include a historic preservation professional who shall be responsible for construction monitoring. This professional shall meet the National Park Service standards for a qualified historic architect.[39]

Mitigation Measure C-7: An interpretive program involving photographic exhibits and other educational media shall be developed to chronicle the history of the site, its architects, technological innovations, and uses. These materials shall be placed in the historic buildings on-site, and made accessible to the public.

Mitigation Measure C-8: If a unique archaeological resource was discovered during project construction activities, work in the area would cease and deposits would be treated in accordance with Federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. In addition, if it is determined that an archaeological site is a historical resource, the provisions of Section 21084.1 of the Public Resources Code and CEQA Guidelines Section 15064.5 would be implemented.

Mitigation Measure C-9: A qualified paleontologist shall be retained by the Applicant to perform inspections of excavation or grading activity in sediments five feet or more below the original ground surface. The frequency of inspections shall be based on consultation with the paleontologist and will depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If fossils are found during monitoring, the paleontologist shall prepare a report summarizing the results of the monitoring program including methods of fossil recovery and curation, and a description of the fossils collected and their significance. A copy of the report shall be provided to the Applicant and to the City of Los Angeles. The fossils and a copy of the report will be deposited in an accredited curation facility.

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[39] *U.S. Department of the Interior, National Park Service. "Archeology and Historic Preservation: Secretary of the Interior's Professional Qualifications Standards." http://www.nps.gov/history/local-law/arch_stnds_9.htm*

6. Level of Significance After Mitigation

The project as proposed would include the rehabilitation of the Radio Building, Studio A, the Commercial/Television Building, and the Sunset Courtyard in accordance with the Secretary of the Interior's Standards. Thus, impacts associated with rehabilitation of these resources would be less than significant.

The demolition of Studio B/C would not conform to the Secretary of Interior Standards and would result in a significant impact. Removal of Studio B/C could also constitute a significant adverse change to the historic resource due to its size, spatial relationship to the complex, and function. In addition, as described above, the design, location, size, scale and massing of new development within the site would significantly alter the historic relationships with the Columbia Square Complex and nearby historic resources (including the Selma-La Baig Historic District and historic resources along the Sunset corridor). While the proposed mitigation measures would reduce impacts on historic resources, such impacts would remain significant and unavoidable. In accordance with CEQA, demolition of a portion of the Complex cannot be mitigated to a level of insignificance. As described in detail in Section V, Alternatives of this Draft EIR, mitigation measures to reduce these significant impacts were considered and were determined to be infeasible.

With compliance with regulatory requirements and the mitigation measure provided above, impacts associated with archeological and paleontological resources would be less than significant.

IV. Environmental Impact Analysis
D. Hazards and Hazardous Materials

1. Introduction

This section provides an analysis of potential impacts that would occur relative to hazards and hazardous materials due to implementation of the project. The analysis is based largely on a Phase I Environmental Site Assessment Update (Phase I Update) prepared for 6121 Sunset Boulevard (May 2006) and a Phase I Environmental Site Assessment (Phase I) and Preliminary Screening Subsurface Assessment (Phase II) prepared for 6122 and 6124 Selma Avenue (July 2006). The reports, which were all prepared by California Environmental Geologists Engineers Inc., are provided in Appendix D of this EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Hazardous Materials Management

The use and storage of hazardous materials are subject to local, State, and Federal regulations. At the local level, the Los Angeles Fire Department (LAFD) monitors the storage of hazardous materials for compliance with the local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. In addition, employees and employees of contractors that handle hazardous wastes or are potentially exposed to hazardous wastes, are required under Federal Occupational Safety and Health Administration (OSHA) (29 C.F.R. §1910.120) and State OSHA (Cal-OSHA) regulations to be trained and certified to handle hazardous waste and materials.

The Department of Toxic Substances Control (DTSC) regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC operates programs to accomplish the following: (1) deal with

the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

The storage of hazardous materials in underground storage tanks (USTs) is regulated by the State Water Resources Control Board (SWRCB), which has delegated authority to the Regional Water Quality Control Board (RWQCB) and typically on the local level, to the fire department. The LAFD administers and enforces Federal and State laws and local ordinances for USTs at the project site. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

(2) Asbestos Containing Materials

Asbestos, which is made up of microscopic fibers, is a naturally occurring mineral. Asbestos has unique qualities which include its strength, fire resistance, resistance to chemical corrosion, poor conduction of heat, noise, and electricity, and low cost. Asbestos has been widely used in the building industry for a variety of uses, including acoustic and thermal insulation and fireproofing. It is often found in ceiling and floor tiles, linoleum, and pipes, as well as on structural beams and asphalt. Despite its useful qualities, asbestos is associated with lung diseases caused by inhalation of airborne asbestos fibers. Asbestos becomes a hazard if the fibers separate and become airborne. Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1989 could contain asbestos containing materials (ACM).

In California, any facility known to contain asbestos is required to have a written asbestos management plan (also known as an Operations and Maintenance Program [O&M Program]). Removal of ACM must be conducted in accordance with the requirements of South Coast Air Quality Management District (SCAQMD) Rule 1403. Rule 1403 regulations require that the following actions be taken: (1) a survey of the facility prior to issuance of a permit by SCAQMD; (2) notification of SCAQMD prior to construction activity; (3) asbestos removal in accordance with prescribed procedures; (4) placement of collected asbestos in leak-tight containers or wrapping; and (5) proper disposal.

(3) Lead-Based Paint

Lead is a naturally occurring element and heavy metal that was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950. Lead compounds continued to be used as corrosion inhibitors, pigments, and drying agents from the early 1950s to 1972, when the Consumer Products Safety Commission specified limits on lead content in such products. While adults can be affected by excessive exposure to

lead, the primary concern is the adverse health effects on children. The most common paths of lead exposure in humans are through ingestion and inhalation. Lead-based paint is of concern both as a source of exposure and as a major contributor to lead in interior dust and exterior soil.

Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, California Code of Regulations (CCR) Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.

(4) Methane Gas

Chapter IX, Article 1, Division 71, Section 91.7103 of the Los Angeles Municipal Code (LAMC), also known as the Los Angeles Methane Seepage Regulations, provides requirements for buildings and paved areas located in areas classified as being located either in a methane zone or a methane buffer zone. Requirements for new construction within such zones include installing a barrier (i.e., a membrane shield) between the building and underlying earth, installing a vent system(s) beneath the barrier and/or within the building, and installing a gas (methane) detection system. The project site is not located in a methane zone or methane buffer zone.

(5) Airport Safety Provisions

The Federal Aviation Administration (FAA) has established an advisory circular with regard to safety concerns associated with the construction of high-rise buildings since such buildings may present a hazard to aircraft operations.[1] This requirement is in effect for buildings with a height of over 200 feet above ground level (AGL) at the object site.[2] In this regard, Federal Aviation Regulations (FAR) Part 77, Objects Affecting Navigable Airspace, establishes minimum standards to ensure air safety by regulating the construction or alteration of buildings or structures that may affect airport operations.[3]

The FAA requires that Form 7460-1, Notice of Proposed Construction or Alteration be filed with the FAA regional office prior to construction for buildings that are 200 feet or greater in height from the grading terrain. In addition, generally any structure that exceeds

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[1] *FAA Advisory Circular 150/5300-13 (September 30, 2000).*

[2] *Ibid.*

[3] *FAR. 14 C.F.R. Part 77 (2001).*

an overall height of 200 feet AGL should be marked and/or lighted.[4] However, the determination is made by FAA and depends on terrain features, weather patterns, geographic location, number of structures, and overall layout of design.[5]

b. Historical Uses of the Project Site

The project site was undeveloped until the early 1900s. In 1910, the first studio was developed on the southern portion of the project site in addition to several residences throughout the project site. From 1910 to 1919, additional residences were constructed on previously undeveloped portions of the project site. In 1919, an east-west street (Salem Place) was located in the center of the project site, dividing the property in half. The studio (noted as Christie Film Company) and residences were still present at this time. In the late 1930s, CBS and KNX Radio redeveloped the southern portion of the project site with the existing structures which resulted in the removal of some of the residences formerly located on this portion of the project site. The residences located on the northern portion of the project site remained for the most part. The existing L-shaped structure located on the northern portion of the project site (6122 and 6124 Selma Avenue) was present at this time and appears to have been a store. A public garage also appears to have been present just south of the store. In 1950, the east-west street (now Harold Way) was still present on the project site in addition to many of the residences. An auto repair facility was noted on the northern portion of the project site (6122 and 6124 Selma Avenue) just south of the store. By 1970, with the exception of the structures that were previously located on the northern portion of the project site (6122 and 6124 Selma Avenue), the northern portion of the project site had been redeveloped with the existing parking lot. By 1973, the northern portion of the project site was occupied by Criterion Music Publishing. Historical use of the project site may present a concern to the project site since contamination may have occurred from the former auto repair facility located on the northern portion of the project site.

c. Existing Conditions

The project site is currently developed with several buildings, which are currently utilized as entertainment-related, production, and post-production offices and studios (6121 Sunset Boulevard). A planted courtyard (Sunset Courtyard) is located on the southern portion of the project site, immediately north of Sunset Boulevard between the Radio Building and Television Building. The remaining portion of the project site consists

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[4] *FAA Advisory Circular AC 70/7460-1K (August 1, 2000).*

[5] *Ibid.*

of a surface parking lot. Various hazardous materials are located on the project site as discussed in further detail below.

(1) Hazardous Materials Database Site Listing

As part of the Phase I and Phase I Update, environmental agency databases were reviewed to ascertain whether the project site or any properties within a determined radius of the project site were listed on local, State, or Federal databases. Both properties located on the project site are listed on databases. The television and radio station operations located at 6121 Sunset Boulevard are listed on the Hazardous Waste Information System (HAZNET), Emissions Inventory Data (EMI), Underground Storage Tank (UST), California Facilities Inventory Database (CA FID UST), Statewide Environmental Evaluation and Planning System (SWEEPS), and Historical UST databases. The majority of the listings pertain to the former UST and existing UST located at the project site (discussed in greater detail below). The EMI listing pertains to emissions associated with the diesel emergency generators located at the project site. Additionally, 6122 Selma Avenue (previously Criterion Music Publishing) is listed on the EDR Historical Auto Stations (EDR HAS) database. The EDR HAS listing pertains to the former auto repair facility located on the project site (discussed in greater detail below).

Several properties located within the vicinity of the project site were also listed on various databases, including the Resource Conservation and Recovery Information System-Small Quantity Generator (RCRIS-SQG), Facility Index System (FINDS), CLEANERS, HAZNET, EMI, UST, CA FID UST, SWEEPS UST, Historical UST, Waste Discharge System (CA WDS), Emergency Response Notification System (ERNS), EDR Historical Auto Stations, and EDR Historical Cleaners databases. These properties include but are not limited to dry cleaners, gas stations, auto repair facilities, medical facilities, and photo processing centers. Due to the distance of these properties from the project site, their cross- or down-gradient direction relative to the project site, and/or their current status (e.g., permit only, case closed, etc.), they are not expected to present a concern to the project site. For detailed information regarding these listings, please refer to the Phase I and Phase I Update in Appendix D of this EIR.

(2) Hazardous Materials Management

(a) Hazardous Substances Use

Small quantities of hazardous substances are currently used on the portion of the project site occupied by television and radio station operations including common cleaning and maintenance supplies, paints, pesticides, motor oil, hydraulic oil, coolant, refrigerant,

and lacquer thinner. Because these supplies are used in small quantities on the project site, they do not pose an environmental concern.

(b) Poly-chlorinated biphenyls (PCBs)

Fluorescent light ballasts are located within the buildings occupied by television and radio station operations. Fluorescent light ballasts manufactured prior to 1979 may contain small quantities of poly-chlorinated biphenyls (PCBs). Since these buildings were constructed prior to 1979, it is possible that the fluorescent light ballasts contain PCBs.

(c) Aboveground and Underground Storage Tanks

Two 50-gallon aboveground storage tanks (ASTs), one 100-gallon AST, and a 6,000-gallon UST all containing diesel fuel for emergency generators are located on the portion of the project site currently occupied by television and radio station operations. The three ASTs are located in a generator building located near the southwest corner of the project site. The UST is located immediately north of the generator building. The UST was installed on the project site in 1995. According to containment tightness test reports, there is a leak within the secondary containment of the UST. The leak is likely from a failed rubber boot or penetration leak within the secondary containment piping. No evidence of a fuel release is evident to date.

At the time the existing 6,000-gallon UST was installed on the project site in 1995, another 6,000-gallon UST was abandoned at the same location. Soil samples were collected during the removal of the former UST and analyzed for total petroleum hydrocarbons as diesel (TPH-D); benzene, toluene, ethylbenzene, and xylene (BTEX); and lead. The soil samples were non-detect for TPH-D and BTEX and below current action levels for lead. LAFD issued a no further action letter with regard to the former UST in September 1999. Therefore, the former UST does not present an environmental concern to the project site.

(d) Asbestos Containing Materials

Because all of the existing buildings located on the project site were constructed prior to 1980, it is likely that asbestos is present in some of the building materials (i.e., floor tiles and mastic, ceiling tiles, and piping insulation wrap). Furthermore, signs stating the presence of asbestos were observed in the buildings occupied by television and radio station operations.

(e) Lead-Based Paint

Due to the time frame in which the buildings located on the project site were constructed, it is also possible that lead-based paint is present. No lead-based paint sampling has been conducted at the project site.

(3) Methane Gas

The project site is not located within a City-designated methane zone or methane buffer zone.[6] Furthermore, according to Division of Oil, Gas, and Geothermal Resources (DOGGR) records, no oil wells are located directly on the project site.

3. Project Impacts

a. Methodology

To assist in evaluating potential impacts associated with hazards and hazardous materials that would occur from construction and/or operation of the project, a Phase I, Phase I Update, and Phase II were conducted at the project site. The Phase I and Phase I Update are intended to identify the likelihood of past, present, or potential releases of hazardous materials at a site. The characterization is based on readily ascertainable information and site observations. The Phase II is intended to determine if contamination is present at a site. The characterization is based on soil and/or groundwater sampling.

Based on the results of the above-mentioned reports, the potential for construction and/or operation of the project to result in significant impacts associated with hazards and hazardous materials was evaluated.

Hazards impacts associated with emergency response and evacuations are discussed in Section IV.H.1, Fire Protection, of this EIR.

b. Significance Thresholds

The following factors are set forth in the *City of L.A. CEQA Thresholds Guide (2006)* for consideration on a case-by-case basis in making a determination of significance:

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[6] *City of Los Angeles Department of Public Works, LAMC, Methane Ordinance Map A-20960. City Ordinance No. 175,790. (February 4, 2004).*

(1) Risk of Upset/Emergency Preparedness

- Compliance with the regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

(2) Human Health Hazards

- Compliance with the regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

Based on these factors, the project would be considered to have a significant risk of upset/emergency preparedness or human health hazard impact if:

- It does not comply with applicable regulations regarding the handling and storage of hazardous materials or if it would consistently increase interference with existing emergency response capacity to the project area over existing conditions.

c. Analysis of Project Impacts

(1) Historical Uses of the Project Site

An auto repair facility was located on the northern portion of the project site from approximately the late 1930s to at least the 1950s. No agency records were found regarding this former use. Given the variety of hazardous materials used in auto repair facilities, contamination may have occurred at the project site from this former use. In June 2006, a subsurface assessment was conducted on the project site to determine if soil contamination had in fact occurred. Six soil borings were penetrated on the project site to

depths of 5 feet below ground surface (bgs). A total of fifteen soil samples were obtained from these borings. The locations of the soil borings are depicted in Figure IV.D-1 on page IV.D-10. The samples were analyzed for TPH, volatile organic compounds (VOCs), and metals. The soil samples were non-detect for TPH and VOCs with the exception of soil boring no. 6. Approximately 4.5 milligrams per kilogram (mg/kg) of TPH was detected 0.5 feet bgs at this location. With regard to metals, the soil samples were either non-detector within the current Preliminary Remediation Goals (PRGs) established by the U.S. Environmental Protection Agency for residential uses, with the exception of soil boring no. 6.[7] Lead was detected at 620 mg/kg and 680 mg/kg at 0.5 feet and 1.5 feet bgs, respectively, at this location. The PRG for lead is 150 mg/kg. Soil boring no. 6 at 1.5 feet was also analyzed for soluble lead which was detected to be 51 milligrams per liter (mg/L). A soluble lead value over 5 mg/L is considered hazardous material and requires proper disposal. Elevated levels of lead were found to persist to depths of about 2 feet near soil boring no. 6. The TPH and lead contamination is most likely from the former auto repair facility. Because this portion of the project site is proposed to be redeveloped with residential uses, the soil contamination may present a concern to future residents. Therefore, Mitigation Measure D-1 below is recommended to reduce potential impacts from soil contamination to a less than significant level.

(2) Hazardous Materials Management

(a) PCBs

Fluorescent light ballasts are located within the buildings occupied by television and radio station operations. It is possible that they contain PCBs. Implementation of the project could result in generation of PCB wastes during demolition and renovation activities. However, potential impacts from PCB-containing fluorescent light ballasts would be reduced to a less than significant level with the incorporation of Mitigation Measure D-2 below.

(b) Underground Storage Tanks

A 6,000-gallon diesel UST is located immediately north of the generator building located near the southwest corner of the project site. According to containment tightness test reports, there is a leak within the secondary containment of the UST. The leak is likely from a failed rubber boot or penetration leak within the secondary containment piping. No evidence of a fuel release is evident to date. Prior to project building construction, this UST

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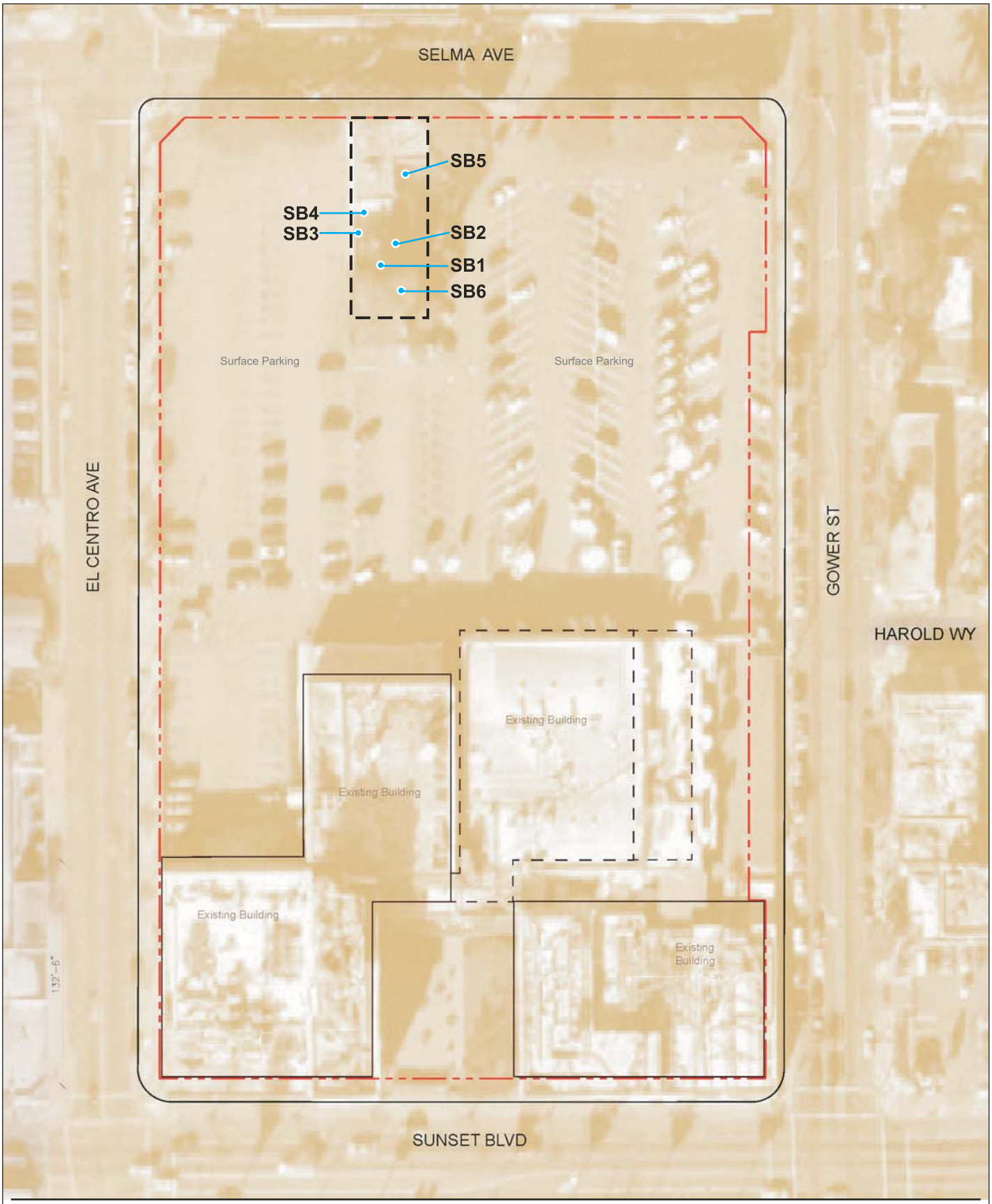
[7] *PRGs are estimated soil concentrations that the agency considers protective of human health. Although concentrations above these levels would not automatically designate a site as dirty or trigger a response action, exceeding a PRG suggests that further evaluation of the potential risk is appropriate.*



Columbia Square

matrix environmental

N

0 80 160 Feet

Figure IV.D-1
Soil Sampling Locations

Source: Johnson Fain International, Inc., 2007 and California Environmental, July 2006.

would be removed. Soil contamination may exist below the UST and associated piping. Therefore, Mitigation Measure D-3 below is proposed to reduce potential impacts from the UST and associated soil contamination to a less than significant level.

(c) Asbestos Containing Materials

Because all the existing buildings located on the project site were constructed prior to 1980, it is likely that asbestos is present in some of the building materials (i.e., floor tiles and mastic, ceiling tiles, and piping insulation wrap). Furthermore, signs stating the presence of asbestos were observed in the buildings occupied by television and radio station operations. The project proposes to demolish and/or renovate the existing buildings located on the project site. The demolition and/or renovation of these buildings would have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or removed prior to demolition or renovation activities. The removal of asbestos is regulated by SCAQMD Rule 1403 and therefore, would be removed by a certified asbestos containment contractor in accordance with applicable regulations prior to demolition or renovation. Therefore, with implementation of Mitigation Measure D-4 below, impacts related to asbestos would be reduced to a less than significant level.

(d) Lead-Based Paint

Due to the time frame in which the existing buildings located on the project site were constructed, it is possible that lead-based paint is present. No lead-based paint sampling has been conducted at the project site. Since the project proposes to demolish and/or renovate the existing buildings located on the project site, the potential for lead exposure exists. However, with the implementation of Mitigation Measure D-5 below, potential impacts from lead exposure would be reduced to a less than significant level.

(3) Methane Gas

The project site is not located within a City-designated methane zone or methane buffer zone.[8] Furthermore, according to DOGGR records, no oil wells are located directly on the project site. Therefore, no impacts with regard to methane gas are anticipated to occur.

[8] *City of Los Angeles Department of Public Works, LAMC, Methane Ordinance Map A-20960. City Ordinance No. 175,790. (February 4, 2004).*

(4) Airport Safety Provisions

As described previously, Federal Aviation Regulations (FAR) Part 77, Objects Affecting Navigable Airspace, establishes minimum standards to ensure air safety by regulating the construction or alteration of buildings or structures that may affect airport operations. The FAA requires that Form 7460-1, Notice of Proposed Construction or Alteration be filed with the FAA regional office prior to construction for buildings that are 200 feet or greater in height from the grading terrain. In addition, generally any structure that exceeds an overall height of 200 feet AGL should be marked and/or lighted. However, the determination is made by FAA and depends on terrain features, weather patterns, geographic location, number of structures, and overall layout of design. The finished height of the proposed residential tower would be approximately 467 feet AGL with other elements such as the helipad and architectural features extending to a maximum of 512 feet AGL. In addition, the proposed high-rise office building would be approximately 204 AGL, with other elements such as the helipad and architectural features extending to a maximum of approximately 260 feet AGL. The Project Applicant would file the appropriate forms subject to the approval of the FAA to ensure that the project would not result in significant impacts relative to airport safety.

4. Cumulative Impacts

All related development located within the vicinity of the project site would be subject to the same local, regional, State, and Federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the concurrent development of the project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

5. Mitigation Measures

Mitigation Measure D-1: Prior to issuance of a grading permit, the Project Applicant shall hire a qualified environmental consultant to excavate and dispose of contaminated soils, or treat in-situ (in place), in accordance with applicable regulatory requirements and approved by applicable governmental authorities. If during grading activities additional contamination is discovered, grading within such an area shall be temporarily halted and redirected around the area until the appropriate evaluation and remediation measures are implemented in accordance with applicable regulatory requirements so as to render the area suitable for grading activities to resume.

Mitigation Measure D-2: Prior to demolition and/or renovation activities, all fluorescent light ballasts shall be inspected for PCBs. Any PCB-containing fluorescent light ballasts shall be disposed of in accordance with applicable regulatory requirements and approved by applicable governmental authorities.

Mitigation Measure D-3: During removal of the 6,000-gallon diesel UST, soil sampling shall be conducted below and in the immediate vicinity of the UST and associated piping. The Project Applicant shall submit the results of the soil survey to the City of Los Angeles Department of Building and Safety. If soil contamination is found, it shall be removed or remediated in accordance with applicable regulatory requirements.

Mitigation Measure D-4: Prior to issuance of demolition permits, the Project Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that an asbestos survey has been conducted at all existing buildings located on the project site. If asbestos is found, the Project Applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule 1403.

Mitigation Measure D-5: Prior to issuance of demolition permits, the Project Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that a lead-based paint survey has been conducted at all existing buildings located on the project site. If lead-based paint is found, the Project Applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead-based paint.

6. Level of Significance After Mitigation

Potentially significant impacts associated with hazards and hazardous materials would be reduced to less than significant with implementation of the aforementioned mitigation measures.

IV. Environmental Impact Analysis

E. Hydrology and Water Quality

1. Introduction

This section provides an analysis of the project's potential impacts associated with hydrology and water quality. The analysis is based on a Preliminary Hydrology Report and a Preliminary Stormwater Quality Mitigation Report, which were prepared in April 2009 by Hall & Foreman. These reports are provided in Appendix E of this EIR.

2. Environmental Setting

a. Regulatory Framework

Regulatory and permitting processes have been established to control the quality of surface water runoff during construction and operation of development projects. In 1972, the Federal Water Pollution Control Act, also referred to as the Clean Water Act, was amended to provide that the discharge of pollutants into waters of the U.S. from any point source is unlawful, unless a National Pollutant Discharge Elimination System (NPDES) permit authorizes the discharge. The Clean Water Act was amended in 1987 requiring the U.S. Environmental Protection Agency (USEPA) to create specific requirements for discharges. In response to the 1987 amendments to the Clean Water Act, Phase I of the USEPA NPDES Program required NPDES permits for: (1) municipal separate storm sewer systems generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) eleven specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or more of land. As of March 2003, Phase II of the NPDES Program extends the requirements for NPDES permits to numerous small municipal separate storm sewer systems, construction sites of one to five acres, and industrial facilities owned or operated by small municipal separate storm sewer systems, which were previously exempted from permitting.

Section 402(p) of the Clean Water Act mandates that the municipal permits must: (1) effectively prohibit the discharges of non-stormwater to the system except under certain provisions; and (2) require controls to reduce pollutants in discharges from the system to the maximum extent practicable, including Best Management Practices (BMPs), control techniques, and system, design, and engineering methods.

A municipal NPDES permit was issued to the County of Los Angeles and 84 incorporated cities (with the exception of the City of Long Beach) in December 2001.[1] To meet the Los Angeles County municipal NPDES permit requirements, municipalities are required to implement the Storm Water Quality Management Program that was prepared as part of the Report of Waste Discharge filed as part of the NPDES approval process. Pursuant to this program, municipalities, including the City of Los Angeles, are required to conduct a variety of activities including, but not limited to, the following:

- Implement a public information and participation program to conduct outreach on stormwater pollution;
- Control discharges at commercial/industrial facilities through tracking, inspecting, and ensuring compliance at facilities that are critical sources of pollutants;
- Implement a development planning program for specified development projects;
- Implement a program to control construction runoff from construction activity at all construction sites within its jurisdiction;
- Implement a public agency activities program to minimize stormwater pollution impacts from public agency activities; and
- Implement a program to document, track, and report illicit connections and discharges to the storm drain system.

In accordance with the Los Angeles County municipal NPDES permit requirements, the City of Los Angeles has developed and completed several programs and activities, including the adoption of ordinances relating to regulation and completion of the *Development Best Management Practices Handbook* regarding both construction (Part A) and planning (Part B) activities.

(1) Construction

The California General Construction Activity Permit, adopted by the State Water Resources Control Board (SWRCB) regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area.[2] This general permit authorizes the discharge of stormwater to surface waters from

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1. *County of Los Angeles Municipal Permit (NPDES No. CAS004001, Order No 01-182).*
2. *State Water Resources Control Board NPDES General Permit for Discharges Associated with Construction Activity (Water Quality Order No. 99-08-DWQ).*

construction activities. It prohibits the discharge of materials other than stormwater and authorized non-stormwater discharges and all discharges that contain a hazardous substance in excess of reportable quantities established in 40 Code of Federal Regulations (CFR) 117.3 and 40 CFR 302.4 unless a separate NPDES permit has been issued to regulate those discharges. The NPDES General Construction Activity Permit requires that all developers of land where construction activities will occur over more than one acre do the following:

- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards; and
- Perform inspections and maintenance of all BMPs.

In order to obtain coverage under the NPDES General Construction Activity Permit, a project applicant must submit a Notice of Intent (NOI) to the Regional Water Quality Control Board (RWQCB) and prepare a SWPPP. BMPs within the SWPPP typically address minimization of erosion during construction, stabilization of construction areas, sediment control, control of pollutants from construction materials, as well as post-construction management (e.g., the minimization of impermeable surfaces, treatment of runoff, etc). The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

The City of Los Angeles *Development Best Management Practices Handbook, Part A Construction Activities,* 3rd Edition, adopted by the City of Los Angeles Department of Public Works in September 2004, and associated ordinances also have specific minimum BMP requirements for all construction activities and require that construction projects with one acre and greater of disturbed soil require the preparation of an SWPPP and filing of a NOI with the SWRCB to comply with the state NPDES General Construction Activity Permit.

(2) Operation

As discussed above, the Los Angeles County NPDES permit requires municipalities to implement a development planning program to address stormwater pollution by requiring individual projects to prepare a permanent Standard Urban Stormwater Mitigation Plan (SUSMP). Under the provisions of the permit, project applicants for certain types of projects will be required to implement SUSMP requirements for the operational life of the project to ensure that stormwater pollution is addressed by incorporating BMPs in the

design phase of development. The City of Los Angeles has incorporated these requirements into its *Development Best Management Practices Handbook, Part B Planning Activities*, Third Edition, adopted by the City of Los Angeles Department of Public Works in June 2004. Compliance with the requirements of this manual is required by City of Los Angeles Ordinance No. 173,494. Based on the *Development Best Management Practices Handbook, Part B*, the project falls into the following categories that are subject to the SUSMP requirements:

- Housing developments (including single-family homes, multi-family homes, condominiums, and apartments) of 10 or more units;
- Industrial/commercial development with one acre or more of impervious surface area;
- Restaurants; and
- Parking lots with 5,000 square feet or more of surface area or with 25 or more parking spaces.[3]

The SUSMP provisions that are applicable to these and other land use categories include: (1) reducing peak runoff discharge rates; (2) conserving natural areas; (3) minimizing stormwater pollutants of concern; (4) protecting slopes and channels; (5) providing storm drain stenciling and signage; (6) properly designing outdoor material storage areas; (7) providing proof of on-going BMP maintenance; and (8) designing standards for structural or treatment control BMPs. In addition, project applicants for these projects will be required to select source control and, in most cases, treatment control BMPs from the list approved by the RWQCB and included in the SUSMP. In combination, these treatment control BMPs must be sufficiently designed and constructed to treat, infiltrate, or filter stormwater runoff from one of the following:

- The 85th percentile 24-hour runoff event determined as the maximized capture stormwater volume for the area, from the formula recommended in *Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998)*;
- The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in

[3] *"Parking lot" means land area or facility for parking or storage of motor vehicles used for business, commerce, industry, or personal use, with a lot size of 5000 square feet or more of surface area, or with 25 or more parking spaces.*

California Stormwater Best Management Practices Handbook—Industrial/ Commercial, (1993);

- The volume of runoff produced from a 0.75-inch storm event, prior to its discharge to a stormwater conveyance system; or

- The volume of runoff produced from a historical-record based reference 24-hour rainfall criterion for "treatment" (0.75-inch average for the Los Angeles County area) that achieves approximately the same reduction in pollutant loads achieved by the 85th percentile 24-hour runoff event.

In addition, the BMPs must control peak flow discharge to provide stream channel and over bank flood protection, based on flow design criteria selected by the local agency.

The Los Angeles County Department of Public Works also requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of the storm drain and street flow be able to convey a 50-year storm event. In areas with a sump condition, the storm drain conveyance system shall be designed for a 50-year storm event.[4] As set forth in Section 62.105 of the Los Angeles Municipal Code (LAMC), a B permit is required for any proposed drainage improvements including the installation of storm drains, within the street right of way or any other property owned by, to be owned by, or under the control of the City. As part of the B-permit process, storm drain installation plans are subject to review and approval by the City of Los Angeles Department of Public Works Bureau of Engineering.[5] Additionally, any connections to the City's storm drain system from a property line to a catch basin or a storm drain pipe would require a storm drain permit from the City of Los Angeles Department of Public Works, Bureau of Engineering.

b. Existing Conditions

(1) Hydrology

The project site includes approximately 4.68 acres located within the Hollywood community of the City of Los Angeles. The project site lies within the Ballona Creek

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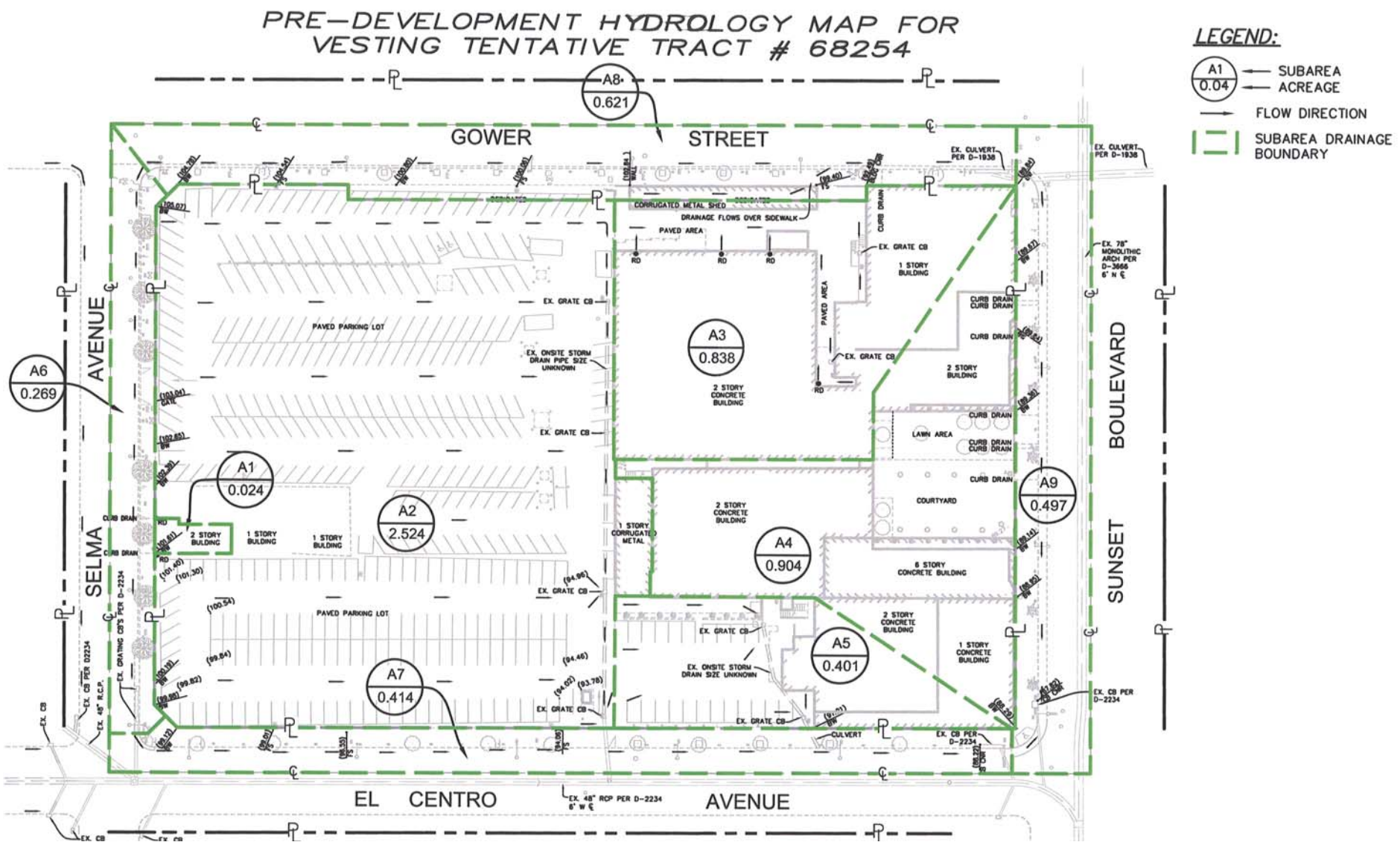
4. *Los Angeles County Department of Public Works Hydrology Manual, January 2006, http://ladpw.org/wrd/Publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf, accessed April 9, 2007.*

5 *Los Angeles County Department of Public Works, Bureau of Engineering, http://eng.lacity.org/index.cfm; accessed May 21, 2008.*

Watershed, which encompasses 130 square miles.[6] The Ballona Creek Watershed comprises a nine-mile long flood protection channel that drains the Los Angeles basin, from the Santa Monica Mountains on the north, the Harbor Freeway (110) on the east, and the Baldwin Hills on the south. Within this watershed, stormwater that does not percolate into the ground is directed into storm drains that eventually discharge into Ballona Creek, which in turn discharges to the Pacific Ocean.

The majority of the project site is currently developed with impervious surfaces, including several buildings and a surface parking lot. Pervious surfaces include a small, planted courtyard that fronts Sunset Boulevard (the Sunset Courtyard). The project site is located in a drainage area encompassing a total of 6.49 acres, which can be divided into nine drainage subareas (A1through A-9). Figure IV.E-1 on page IV.E-7 depicts each subarea and its drainage pattern. As shown in Figure IV.E-1, Subarea A1 comprises 0.024 acre and is located on the northernmost portion of the project site. Subarea A6 comprises 0.269 acres and includes Selma Avenue and the northern perimeter of the project site. Subarea A1 and Subarea A6 drain to two grating catch basins located on the south side of Selma Avenue east of El Centro Avenue. The two catch basins connect to a 48-inch storm drain in El Centro Avenue, which then conveys flows southerly. As shown in Figure IV.E-1, Subarea A2, which includes 2.524 acres, is located on the northern half of the project site and encompasses the existing parking lot. This subarea drains in a southerly direction to four private grating catch basins located in the existing parking lot along the north side of the existing buildings. The four catch basins connect to the 48-inch storm drain in El Centro Avenue. As shown in Figure IV.E-1, Subarea A3 comprises 0.838 acre and is located on the southeasterly portion of the project site. Subarea A3 drains either through the curb face or via sheet flow to an existing culvert inlet on Gower Street north of Sunset Boulevard. Subarea A8 comprises 0.621 acres and includes the eastern perimeter of the project site. This subarea also drains via sheet flow to an existing culvert inlet on Gower Street north of Sunset Boulevard. Subarea A4 includes the south central and southerly portions of the site and comprises 0.904 acres. Subarea A9 includes the most southerly perimeter of the project site and comprises 0.497 acres. Runoff from Subareas A4 and A9 is intercepted by the existing catch basin on Sunset Boulevard east of El Centro. Drainage from Subarea A5 enters two private grating catch basins located within the small parking area northwest of the building at the corner of El Centro Avenue and Sunset Boulevard. Flows from the two catch basins outlet through a curb drain on El Centro Avenue and combine with flows from Subarea A7 and enter a catch basin on

[6] *County of Los Angeles Department of Public Works, online at: http://ladpw.org/wmd/watershed/bc/; accessed August 21, 2008; Ballona Creek Watershed map, online at: http://www.lagreenmap.org/map_ballona.htm; accessed August 21, 2008.*



Columbia Square

Figure IV.E-1
Existing Hydrological Conditions

matrix environmental

0 60 120 Feet

Source: Hall & Foreman, Inc. 2009

El Centro Avenue near Sunset Boulevard, which connects to the 48-inch storm drain in El Centro Avenue. It should also be noted that the 48-inch storm drain in El Centro Avenue connects to the 78-inch monolithic arch storm drain in Sunset Boulevard. The Stormwater Group of the City's Bureau of Engineering has stated that the existing storm drain system serving the project site has no existing problems.[7]

To estimate the existing stormwater runoff rates at the project site, hydrology calculations were performed using the Los Angeles County of Public Works 2006 Hydrology Manual. Runoff rates were calculated for 10-year and 50-year storm events. As shown in Table IV.E-1 on page IV.E-9, the existing stormwater runoff rate at the project site is approximately 11.86 cubic feet per second (cfs) during a 10-year storm event and 18.85 cfs during a 50-year storm event.

(2) Water Quality

Existing stormwater runoff from the project site has the potential to contribute oil and grease, suspended solids, gasoline, pesticides, and pathogens to the stormwater conveyance system. Stormwater from the project site is currently not treated prior to entering the storm drain system.

3. Project Impacts

a. Methodology

As indicated above, this analysis of hydrology and water quality impacts is based on a Preliminary Hydrology Report and Preliminary Stormwater Quality Mitigation Report, which were both prepared by Hall & Foreman and are provided in Appendix E of this Draft EIR. The reports were prepared based on a review of documents from and methodologies specified by the Los Angeles County Department of Public Works and the City of Los Angeles Department of Public Works.

(1) Hydrology

The analysis of hydrology impacts includes a calculation of pre-project and post-project runoff rates during a 10-year and 50-year storm event. Potential impacts to the storm drain system were analyzed by comparing the calculated pre-project runoff rates to

[7] *Hall & Foreman, Preliminary Hydrology Report, Columbia Square, April 2009.*

Table IV.E-1
Estimated 10-Year and 50-Year Storm Event Runoff Rates Based On Existing Conditions

Subarea	Acres	Q10 (cfs)	Q50 (cfs)
A1	0.024	0.05	0.08
A2	2.524	4.31	6.88
A3	0.838	1.63	2.68
A4	0.904	1.74	2.89
A5	0.401	0.92	1.28
A6	0.269	0.52	0.86
A7	0.414	0.71	1.13
A8	0.621	1.13	1.69
A9	0.497	0.85	1.36
Total	**6.492** [a]	**11.86**	**18.85**

[a] *The subareas include portions of the public right-of-way. Hence the total acreage for the subareas is greater than the total acreage for project site.*

Source: Hall & Foreman, Preliminary Hydrology Report, Columbia Square, April 2009.

the calculated post-project runoff rates, taking into consideration the capacity of the existing storm drain system serving the site. Additional information pertaining to the analysis methodology, including assumptions made in order to perform hydraulic calculations, is provided in Appendix E of this EIR.

(2) Water Quality

For purposes of the water quality analysis, impacts were assessed by evaluating the types of pollutants and/or effects on water quality likely to be associated with construction and operation of the project. Project consistency with relevant regulatory permits/requirements, including BMPs and applicable plans, is evaluated to demonstrate how compliance would ensure that the project would not significantly degrade existing water quality.

b. Significance Thresholds

Based on the *City of L.A. CEQA Thresholds Guide (2006)*, the project would have a significant impact on surface water flow and quality if it would:

(1) Hydrology

- Cause flooding during the projected 50-year developed storm event which would have the potential to harm people or damage property or sensitive biological resources;

- Substantially reduce or increase the amount of surface water in a water body; or
- Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

(2) Water Quality

- Result in discharges that would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

c. Project Design Features

As described below, in compliance with NPDES and City requirements, BMPs would be implemented to address water quality issues during both construction and operation of the project. Construction BMPs would include but not be limited to proper scheduling to avoid mass grading during the rainy season; covering materials such as bags of cement, paint, etc.; designating wash pits for washing paint, stucco, etc.; berming the site to control effluent from leaving a site during a rain event; and establishing sediment traps. During operation of the project, a SUSMP would be prepared which would specify operational BMPs to be implemented. Operational BMPs would be designed to infiltrate and filtrate on-site stormwater runoff in accordance with City requirements. Furthermore, the project's stormdrain system would be designed such that post-development flow rates at each drainage point would not exceed the pre-development flow rates.

d. Analysis of Project Impacts

(1) Construction

Construction of the project would involve site preparation activities including demolition, excavation, and grading. Such activities would temporarily alter the existing drainage patterns and water flows within the project site. During construction, approximately 190,000 cubic yards of soil would be excavated and exported. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as the construction site would be greater than one acre, the project would be required to file a NOI and obtain coverage under the NPDES General Construction Activity Permit (Order No. 99-08-DWQ). In accordance with the requirements of the permit, the project would prepare and implement a site-specific SWPPP, which would specify BMPs and erosion control measures to be used during

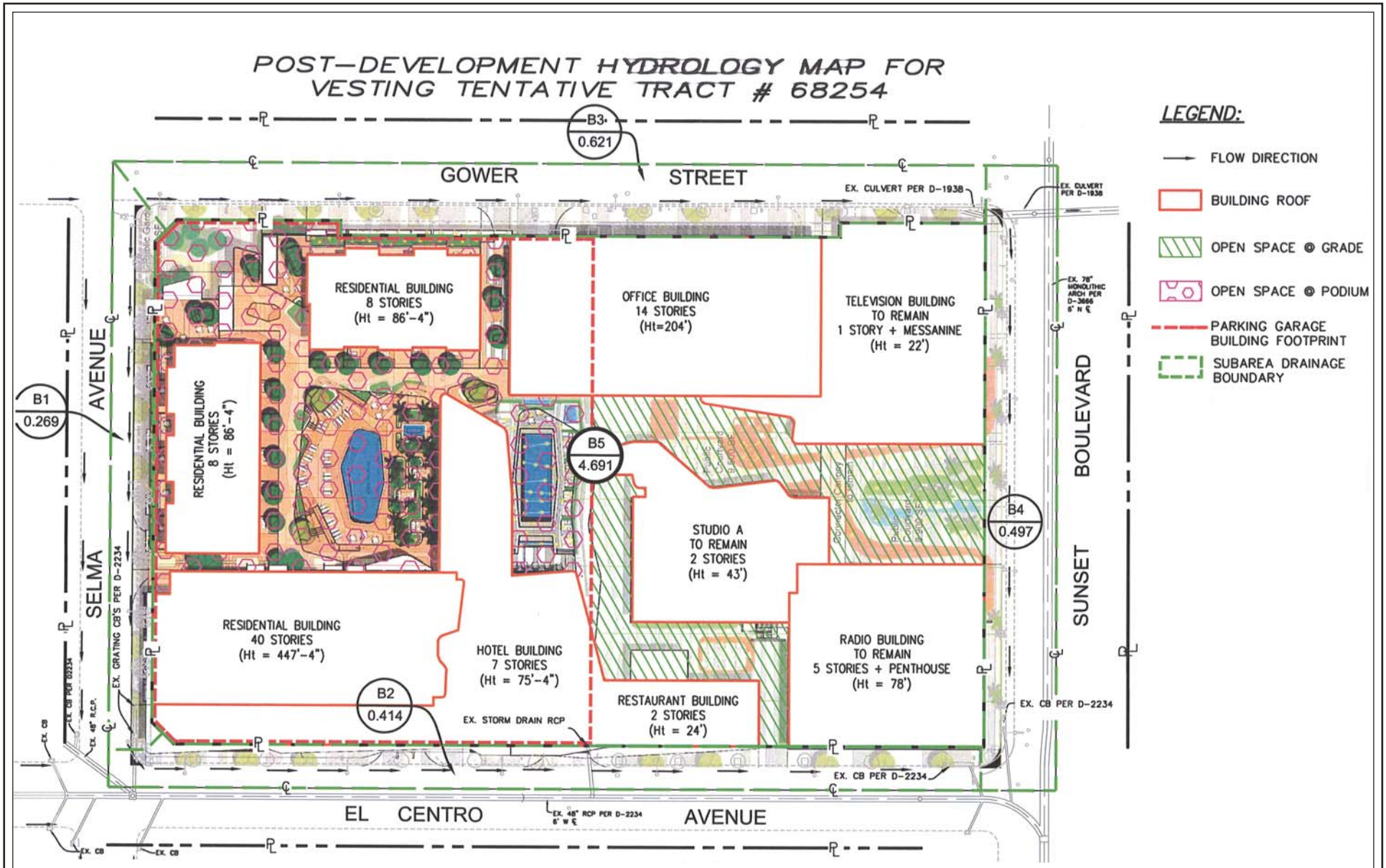
construction to minimize pollution in runoff. BMPs would include but not be limited to proper scheduling to avoid mass grading during the rainy season; covering materials such as bags of cement, paint, etc.; designating wash pits for washing paint, stucco, etc.; berming the site to control effluent from leaving a site during a rain event; and establishing sediment traps. These and other BMPs would eliminate or reduce pollutant levels in runoff during construction activities. In addition, the project would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. Therefore, with compliance with NPDES requirements and City grading regulations, construction-related impacts to hydrology and water quality would be less than significant.

(2) Operation

(a) Hydrology

The project would result in a net increase in pervious surfaces due to the introduction of new landscaped areas throughout the project site. Specifically, the existing planted courtyard that fronts Sunset Boulevard would be retained, while new landscaped areas would be constructed throughout the central and northeastern portions of the project site near the residential buildings, hotel, and offices. After project implementation, pervious areas on the ground level and podium level would constitute 21 percent of the site. .[8] Moreover, the distribution of flows as well as on-site drainage systems would be slightly altered. Existing on-site drains would be modified or abandoned, and new drains (e.g., cast iron pipe, area drains, roof drains, etc.) would be installed. After buildout of the project, the drainage area for the project site would continue to comprise 6.49 acres but this area would be divided into five subareas (B1 through B5). Figure IV.E-2 on page IV.E-12 depicts each subarea and its drainage pattern. As shown in Figure IV.E-2, Subarea B1, located north of the project site, would comprise 0.269 acre and would drain to the existing grating catch basins in Selma Avenue east of El Centro Avenue. As shown in Figure IV.E-2, Subarea B2, located west of the project site, would comprise 0.414 acres. This subarea would drain to the existing catch basin in El Centro Avenue at Sunset Boulevard. As shown in Figure IV.E-2, Subarea B3 would comprise 0.621 acres east of the project site and would drain to the existing culvert in Gower Street. Subarea B4 would comprise 0.497 acres located south of

[8] *This increase takes into account landscaping/pervious open space both on the ground level (22,210 square feet or approximately 11 percent of the lot area) and the podium level (19,970 square feet or approximately 10 percent of the lot area), for a project total of 42,180 square feet of potentially pervious landscaping or approximately 21 percent of the total project site area. The project site currently includes 1.8 percent of pervious landscaping. Thus, the project would result in an estimated 19 percent increase in landscaped area on-site.*



Columbia Square

matrix environmental

0 60 120 Feet

Figure IV.E-2
Proposed Hydrological Conditions

Source: Hall & Foreman, Inc. 2009

the project site. Drainage form Subarea B4 would flow to the existing catch basin in Sunset Boulevard east of El Centro Avenue. Lastly, Subarea B5, which would comprise 4.691 acres, would include the project site.

To estimate the post-project stormwater runoff rates at the project site, hydrology calculations were performed using the Los Angeles County of Public Works 2006 Hydrology Manual.[9] Runoff rates were calculated for the 10-year and 50-year storm events. As shown in Table IV.E-2 on page IV.E-14, the estimated post-project runoff rate at the project site would be approximately 11.14 cfs during a 10-year storm event and 17.69 cfs during a 50-year storm event. The runoff rate during a 10-year storm event would be approximately 0.72 cfs less than the existing runoff rate. The runoff rate during a 50-year storm event would be approximately 1.16 cfs less than the existing runoff rate. Such decreases in runoff rates, which would occur as result of the project's decrease in impervious surface area (due to the introduction of new landscaped areas), would reduce runoff quantities to the local storm drains serving the site, thus allowing for additional capacity within the drainage system. Furthermore, the project's stormdrain system would be designed such that post-development flow rates at each drainage point would not exceed the pre-development flow rates. Therefore, impacts to the existing storm drain system would be less than significant.

(b) Water Quality

As is typical of most major urban developments, stormwater runoff from the project site has the potential to contribute oil and grease, suspended solids, metals, gasoline, pesticides, and pathogens to the stormwater conveyance system. As mentioned above, the project would be required to prepare a SUSMP which would specify operational BMPs to be implemented. Operational BMPs would be designed to infiltrate and filtrate the first 0.75 inches of on-site stormwater runoff in accordance with City requirements.

In addition, as part of the SUSMP, any outdoor trash storage areas would be designed to direct drainage around the walled or screened off enclosure preventing any off-site transport of trash and pollutants. Lastly, an OMP would be developed for each water quality design feature to be implemented by the project. The OMP would specify the water

[9] *It should be noted that run-off rates were calculated using the standard impervious percentages for different land uses as provided in the Los Angeles County Hydrology Manual. These standard percentages assume permeability of 10 or 3 percent, depending on the drainage subarea. However, the project proposes approximately 21 percent of permeable area on the project site, which would thus increase the amount of pervious surface area for the drainage subarea. Thus, the runoff rates provided within this Draft EIR represent the most conservative estimates.*

Table IV.E-2
Estimated 10-Year and 50-Year Storm Event Runoff Rates Based On Project Conditions

Subarea	Acres	Q10 (cfs)	Q50 (cfs)
B1	0.269	0.52	0.86
B2	0.414	0.71	1.13
B3	0.621	1.13	1.69
B4	0.497	0.85	1.36
B5	4.691	7.93	12.65
Total	**6.492** [a]	**11.14**	**17.69**

[a] *The subareas include portions of the public right-of-way. Hence the total acreage for the subareas is greater than the total acreage for project site.*

Source: Hall & Foreman, Preliminary Hydrology Report, Columbia Square, April 2009.

quality design feature and the party responsible for each of the maintenance routines. The OMP would also require a log be kept on-site to record the details of the maintenance routines including 1) the type of maintenance activities or source-control practices, 2) the date the activities were completed, and 3) the name of the operator performing the activities.

With compliance with NPDES and City requirements addressing stormwater runoff, impacts associated with water quality would be less than significant.

4. Cumulative Impacts

As identified in Section III of this EIR, there are 94 related projects within the project vicinity. These projects could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff, resulting in cumulative impacts to hydrology and water quality. However, as with the project, the related projects would be subject to State NPDES permit requirements for both construction and operation. Each related project would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to water quality. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Furthermore, as the project would result in a decrease in stormwater runoff flows, the project could potentially have a beneficial effect relative to the capacity of the local storm drain system available to serve related development in the area. Thus, cumulative impacts to hydrology and water quality would be less than significant.

5. Mitigation Measures

While the project would not result in significant impacts with regard to hydrology and water quality, the following mitigation measures are recommended to further reduce impacts:

a. Construction

Mitigation Measure E-1: All wastes from construction of the project shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.

Mitigation Measure E-2: Leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.

Mitigation Measure E-3: Material spills shall not be hosed down at the pavement. Dry cleanup methods shall be used wherever possible.

Mitigation Measure E-4: Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or cover with tarps or plastic sheeting.

Mitigation Measure E-5: Where truck traffic is frequent, gravel approaches shall be used to reduce soil compaction and limit the tracking of sediment into streets.

Mitigation Measure E-6: All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop cloths shall be used to catch drips and spills.

Mitigation Measure E-7: A Stormwater Pollution Prevention Plan shall be prepared by a California licensed civil engineer or licensed architect, to the satisfaction of the Stormwater Management Division of the Bureau of Sanitation that shall include the following:

- Identification of the sources of sediments and other pollutants that affect the quality of storm water discharge;
- A monitoring program and reporting plan for the construction period.

- The Storm Water Pollution Prevention Plan shall be retained at the construction site.

b. Operation

Mitigation Measure E-8: The project shall prepare a Standard Urban Stormwater Mitigation Plan (SUSMP), which shall meet the most recent requirements of the City of Los Angeles and the Los Angeles Regional Water Quality Control Board. The SUSMP shall outline specific Best Management Practices (BMPs) to be implemented on the site. Recommended BMPs for the project would include one or a combination of the following stormwater mitigation systems for the first 0.75 inch of rainfall:

- Dry wells and/or infiltration trenches in the proposed courtyards or beneath the foundations of the proposed project buildings to infiltrate stormwater runoff into the native soils.

- Infiltration planters (constructed with a large section of porous stone) on the open space areas of the podium level or the groundlevel courtyards to infiltrate stormwater runoff. Infiltrated runoff would be piped from the planters down into the native soils. Dry wells and/or infiltration trenches would still be needed to properly convey the runoff into the native soils at a smaller scale.

- Collection tanks to store and reuse stormwater runoff for building/irrigation graywater networks. Stormwater runoff from the rooftops would be captured and stored into these tanks throughout the project site. This runoff could be used on-site for irrigation.

The infiltration systems shall include a by-pass system to capture and convey the runoff to the municipal storm drain system. In addition, pollutants would be removed from the stormwater runoff by the infiltration planter areas and mechanical filter units such as downspout filters.

6. Level of Significance After Mitigation

Impacts to hydrology and water quality would be less than significant. Furthermore, mitigation measures are proposed to further reduce impacts.

IV. Environmental Impact Analysis

F. Land Use

1. Introduction

This section provides an analysis of the consistency of the project with land use regulations that guide development of the project site and also evaluates the relationship of the project with surrounding land uses.

2. Environmental Setting

a. Existing Conditions

(1) Project Site

The project site is located within the Hollywood Community of the City of Los Angeles (City), approximately six miles northwest of downtown Los Angeles and 13 miles northeast of the Pacific Ocean. As described in Section II, Project Description, of this EIR, the project site consists of approximately 4.68 acres comprising the city block bound by Selma Avenue to the north, Gower Street to the east, Sunset Boulevard to the south, and El Centro Avenue to the west.

The project site encompasses the existing Columbia Square Complex, which includes several buildings containing television studio and related office uses. The Columbia Square Complex structures are located in the southern portion of the project site, either fronting Sunset Boulevard and/or situated around an outdoor courtyard along Sunset Boulevard. Specifically, the Columbia Square Complex includes four concrete buildings ranging in height from one to five stories. Though the CBS operations at the Columbia Square Complex officially relocated to Studio City in 2005, the buildings on-site are currently utilized as entertainment-related, production and post-production offices and studios. The Columbia Square Complex was designed in an International architectural style, with some of the existing buildings dating back to 1937 and 1938. Please refer to the existing site plan provided in Figure II-3 and the breakdown of the existing structures and floor areas provided in Table II-1, both within Section II, Project Description, of this EIR.

Together, the existing buildings on-site represent approximately 136,233 square feet of floor area.[1]

The remainder of the project site is developed with surface parking, which is accessed from El Centro Avenue, with limited landscaping along the site perimeter in the form of ornamental, non-native/non-protected trees. The project site is generally flat, with a topography that gently slopes down from the north to the south. Given its location within a highly urbanized area, the project site is well served by a network of major roadways, freeways, and public transit providers, as discussed further in this section and in Section IV.I, Transportation and Circulation.

The project vicinity is located in a portion of the City that is undergoing a significant transition. High-density mixed-use development is occurring throughout the area, as the City continues to "[direct] growth to transit-rich and job-rich centers and [support] the growth with smart, sustainable infill development and infrastructure investments.[2] Faced with a growing population, the City has identified various properties throughout the Hollywood area, including the project site, as containing additional residential capacity under current zoning.[3] In addition, the site is located in close proximity to local and regional employment and public transportation opportunities.

(2) Surrounding Uses

As mentioned above, the project vicinity is highly urbanized and built out with predominantly low- to mid-rise buildings. Land uses surrounding the site include a mix of residential, commercial and entertainment uses, including motion picture and television studio/production uses. The area has been undergoing a substantial transformation in recent years, and new and ongoing development in the vicinity includes dense mixed uses with mid-rise and high-rise buildings.

The majority of properties immediately surrounding the project site are zoned for commercial use and designated for commercial manufacturing or regional commercial uses. These properties comprise a variety of uses, including: a two-story office building called the Rich Mar building, a car wash, Bally's Gym facilities, and a four-story parking structure across Selma Avenue to the north; a two-story apartment building, one- and two-

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[1] *Recently, three structures comprising 3,079 square feet located in the northern portion of the site fronting Selma Avenue were demolished. Specifically, these included a two-story, approximately 1,594-square-foot stucco building, a single-story, approximately 878-square-foot brick garage, and a one-story 607-square-foot wood structure. These three buildings fronting Selma Avenue were utilized as offices at the time of the Notice of Preparation (NOP) for the Draft EIR.*

[2] *City of Los Angeles General Plan, Housing Element 2006-2014, Executive Summary, page 1, August 13, 2008.*

[3] *City of Los Angeles General Plan, Housing Element 2006-2014, Appendix H, August 13, 2008.*

story office structures, and retail and restaurant uses to the east along Gower Street, including Sunset Gower Plaza, with a bakery, restaurant, bar, and offices; Sunset Gower Studios, retail facilities, restaurant/bar uses, and the "Gower Gulch," which includes a mix of restaurant and retail establishments to the immediate south and southeast along Sunset Boulevard; the Hollywood Palladium event venue and The House of Blues office tower (Sunset Media Tower) to the west across El Centro Avenue; as well as Nickelodeon Studio and a car wash to the southwest along Sunset Boulevard. Most residential uses in the area are generally situated behind the commercial uses fronting major roadways and thus, single- and multi-family residential uses are located further to the east and northeast of the site, and one- and two-story multi-family residential uses are located further south of the uses that front Sunset Boulevard. Other major uses and facilities in the area include offices, a bank, Hollywood Community Hospital, cinemas, a new mixed-use residential/commercial development, a nightclub, and a number of surface parking lots.

The eclectic nature of the surrounding land uses is highlighted by the medley of land use designations that accompany the zoning of such properties. For example, the current designation of Commercial Manufacturing for several of the nearby properties no longer reflects the uses present in the area. Additionally, the surrounding R4 residentially zoned lots exhibit a variety of designations including High-Medium Residential, Regional Center Commercial, and Highway-Oriented Commercial. As a result, the project vicinity exhibits an inefficient mix of uses resulting in the underutilization and non-cohesive character of the area. Further, with the exception of some of the newer mixed use, restaurant, and retail uses nearby, the area does not provide a pedestrian-friendly atmosphere and current pedestrian activity in the area is minimal.

As discussed briefly above, the project vicinity is well served by a network of major roadways that traverse the City including Sunset Boulevard, Santa Monica Boulevard, and Hollywood Boulevard, all of which function as major transit corridors, as well as the Hollywood (US-101) Freeway. A number of local and regional bus lines operated by the Los Angeles County Metropolitan Transportation Authority (Metro) and the Los Angeles Department of Transportation (LADOT) run throughout the area. Transit hubs include a high capacity Metro Rapid Bus stop located on Argyle Avenue between Hollywood Boulevard and Selma Avenue, just northwest of the project site. In addition, the Metro Red Line heavy-rail subway route runs through the project vicinity, with the nearest station being the Hollywood and Vine Station which is located less than one-quarter mile from the project site, with an entrance near the intersection of Hollywood Boulevard and Argyle Avenue northwest of the site.

b. Regulatory Framework

(1) Local

At the local level, several plans and regulatory documents guide development of the project site. The Hollywood Community Plan constitutes the local land use policy standards of the City of Los Angeles General Plan, and the City of Los Angeles Municipal Code (LAMC) governs land use through specific land use restrictions, design standards, and building and safety codes. The project site is also located within the Hollywood Redevelopment Project Area of the Community Redevelopment Agency (CRA) of Los Angeles, the Hollywood Signage Supplemental Use District (HSSUD), the City's Adaptive Reuse Incentive Area, a City of Los Angeles State Enterprise Zone (EZ), and the Central City Revitalization Zone.[4] These plans and associated regulatory documents/ requirements are described below.

(a) City of Los Angeles General Plan

The General Plan of the City of Los Angeles is a policy document originally adopted in 1974 that serves as a comprehensive, long-term plan for future development of the City. The General Plan sets forth goals, objectives and programs to guide land use policies and to meet the existing and future needs of the community, while integrating a range of State-mandated elements including Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation. Two major components of the General Plan are the Citywide General Plan Framework Element and the Land Use Element, the latter of which comprises 35 local area plans known as Community Plans that guide land use at the local level. The project site is located within the boundaries of the Hollywood Community Plan. These documents are discussed further below.

(i) General Plan Framework

The Citywide General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan. The General Plan Framework provides a strategy for long-term growth that sets a context to guide amendments of the City's Community Plans, zoning ordinances, and other pertinent programs. The General Plan Framework defines Citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. General Plan Framework land use policies are further guided at the community level through the Community Plan.

[4] *The Los Angeles Revitalization Zone (LARZ) was created to foster economic development in areas that suffered damage during the civil unrest that occurred in L.A. County in 1992. The LARZ program ended in 1998, although tax credits are still available for certain businesses.*

For purposes of this land use analysis, relevant chapters in the General Plan Framework include Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, and Transportation. Each of these chapters is discussed below.

The Land Use Chapter of the General Plan Framework designates certain areas within the City as Districts, Centers or Mixed-Use Boulevards (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards). According to Figure 3-1 in the General Plan Framework, the project site is located within a designated Regional Center area, defined as "a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, major entertainment and cultural facilities and supporting services."[5] Regional Centers are also defined as having floor area ratios (FARs) ranging from 1.5:1 to 6.0:1, being developed with buildings of 6 to 20 stories or more, and functioning as major transportation hubs.

The purpose of the Housing Chapter is to present an overview of the critical issues related to housing in Los Angeles, provide goals to guide future action, and specify policies to address housing issues. The adopted Housing Element of the General Plan and the technical analyses and public input to the Framework Element focus on the following major housing-related issues: capacity for the development of future housing units; incentives and barriers to housing production; stability and enhancement of livable neighborhoods; the relationship between jobs and housing; housing quality and type; cost; and rehabilitation and reuse of existing building stock for all City residents of all income levels. The General Plan Framework provides policies to further the goals stated in the adopted Housing Element (dated August 2008) incorporated herein by reference, and provides policy direction for future amendments to the Housing Element.

The Urban Form and Neighborhood Design Chapter establishes the goals of creating: a livable city for existing and future residents; a city that is attractive to future investment; and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. "Urban form" refers to the general pattern of building heights and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood design" refers

[5] *Figure 3-1, Long Range Land Use Diagram, City of Los Angeles General Plan Framework, February 19, 2003.*

As indicated on General Plan Framework Figure 3-1, the Citywide General Plan Framework Element neither overrides nor supersedes the Community Plans. It guides the City's long range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and community plans. The Framework is flexible, suggesting a range of uses within its land use definitions. Precise determinations are made in the Community Plans.

to the physical character of neighborhoods and communities within the City. The General Plan Framework does not directly address the design of individual neighborhoods or communities, but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for updating the community plans. With respect to neighborhood design, the Urban Form and Neighborhood Design Chapter, encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service.

The Open Space and Conservation Chapter calls for the use of open space to enhance community and neighborhood character. The policies of this chapter recognize that there are communities where open space and recreation resources are currently in short supply, and therefore suggests that vacated railroad lines, drainage channels, planned transit routes and utility rights-of-way, or pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.

The Economic Development Chapter seeks to provide physical locations necessary to attract continued economic development and investment to targeted districts and centers. Goals, objectives, and policies focus on retaining commercial uses, particularly within walking distance of residential areas, and promoting business opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods.

The Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. The Transportation Chapter acknowledges that the quality of life for every citizen is affected by the ability to access work opportunities and essential services, affecting the City's economy, as well as the living environment of its citizens. This chapter stresses that transportation investment and policies will need to follow a strategic plan, including capitalizing on currently committed infrastructure and adoption of land use policies to better utilize committed infrastructure. The Transportation Chapter of the General Plan Framework is implemented through the Transportation Element of the General Plan.

Applicable policies and a consistency analysis of the project with each of the General Plan Framework chapters are provided in Table IV.F-1 on page IV.F-23 in the impact analysis below.

(ii) Hollywood Community Plan

The Hollywood Community Plan is one of 35 community and district plans established for different areas of the City that comprise the Land Use Element of the General Plan. The specific purpose of the Hollywood Community Plan is to promote an arrangement of land use, circulation, and services which will encourage and contribute to

the economic, social and physical health, safety, welfare, and convenience of the Hollywood Community, within the larger framework of the City. In addition, it serves to guide the development, betterment, and change of the community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible.

The Hollywood Community Plan is currently in the process of being updated by the City of Los Angeles.[6] The most recent version of the Community Plan, which was adopted in December 1988, designates the project site for Commercial Manufacturing use.[7] The objectives of the current Hollywood Community Plan that are pertinent to the project area include the following:

- To coordinate the development of Hollywood with that of other major parts of the City of Los Angeles and the metropolitan area.
- To further the development of Hollywood as a major center of housing, employment, retail services, and entertainment.
- To make provision 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 promote the economic well-being and public convenience through allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards.
- To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.
- Continued planning of and improvements to the public transportation system for the community.

The Community Plan indicates that much of the land designated for industrial use should continue to be utilized for entertainment-related uses, including film and television production, radio studios, sound and recording studios, and related uses. As previously mentioned, the project site, which is currently designated as Commercial Manufacturing Industrial, is presently occupied by television studio and related office uses. The

[6] *The Draft EIR for the Hollywood Community Plan Update is expected to be completed and released in 2009.*

[7] *The proposed Hollywood Community Plan Update would change the land use designation of the project site to Regional Center Commercial, consistent with the General Plan Amendment sought as part of the project (discussed below).*

Community Plan goes on to state that in order to ensure high quality industrial development appropriate for the urban character of the community, industrial land should be designated in restricted industrial zones such as MR1 and MR2, which allow heavier industrial uses and processes.

The Community Plan also recognizes an area referred to as the Hollywood Center as the focal point of the Hollywood Community. This area encompasses land on either side of Hollywood and Sunset Boulevards between La Brea Avenue and Gower Street, and thus includes the project site. The Plan intends for the Hollywood Center to serve as a commercial and entertainment center for Hollywood and beyond. As stated within the Community Plan, "developments combining residential and commercial uses are especially encouraged in this Center area."

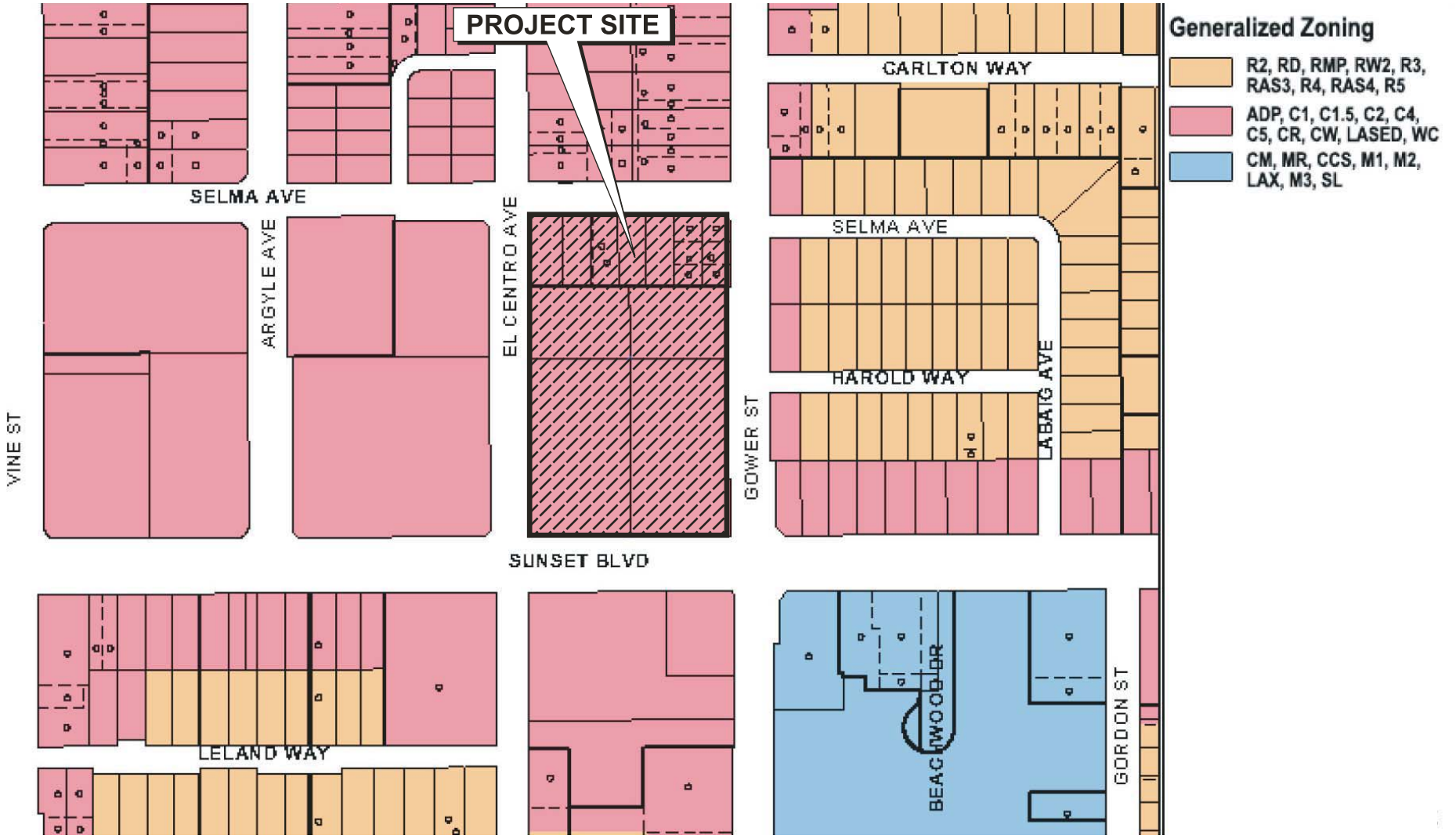
Applicable policies in the Community Plan and a consistency analysis of the project with such policies are provided in Table IV.F-2 on page IV.F-33 in the impact analysis below.

(b) Los Angeles Municipal Code

The City of Los Angeles Planning and Zoning Code (Chapter 1 of the LAMC) regulates development through land use designations and development standards. The project site is currently zoned [Q]C4-1VL-SN. The "[Q]" portion of this designation indicates that a Permanent Qualified Classification condition (referred to as a Qualifying or [Q] condition) applicable to the project site is in place. Per Ordinance No. 165,662 the [Q] condition specifically prohibits "residential uses…, except as otherwise permitted in the industrial zones." The "C4" portion of the zoning designation indicates that the project site is zoned for Commercial uses, while the "1VL" portion of the designation indicates that the site is within a Very Limited Height District No.1, which restricts building heights to a maximum of 45 feet and three stories. The "SN" portion of the zoning designation indicates that the project site is within the Hollywood Signage Supplemental Use District (HSSUD). The HSSUD, discussed further in Section IV.A, Aesthetics, regulates signage in regards to permits, plans, design and construction, materials, street address numbers, identification, maintenance, prohibited locations, and sign illumination. The zoning designations for the project site and surrounding land uses are illustrated in Figure IV.F-1 on page IV.F-9.

(c) CRA Hollywood Redevelopment Plan

The Community Redevelopment Agency's Hollywood Redevelopment Plan (Redevelopment Plan) was adopted by the City Council on May 7, 1986 and most recently amended on October 31, 2003. The Hollywood Redevelopment Project Area (Redevelopment Area) encompasses approximately 1,107 acres bounded by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The Redevelopment Plan supports



Columbia Square

matrix environmental

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0 250 500 Feet

Figure IV.F-1
Generalized Zoning Map

Source: Los Angeles City Planning Department, 2008

the California Community Redevelopment Law and as such is designed to improve economically and socially disadvantaged areas, redevelop or rehabilitate under or improperly utilized properties, eliminate blight, and improve the public welfare. More specifically, the goals established in the Redevelopment Plan include supporting new economic development; promoting/retaining the entertainment industry; reviving the historic core of the area and preserving historically significant structures; preserving and expanding housing; meeting the social needs of residents; and recommending urban design guidelines.

Currently, the Hollywood Redevelopment Plan, like the Hollywood Community Plan, designates the project site for Commercial Manufacturing Industrial land uses. Commercial Manufacturing Industrial uses include entertainment-related (e.g., film, television, and radio) production, retail, office, light manufacturing, parking, and related uses, as well as designated Community Commercial uses. As the Project Applicant seeks a General Plan Amendment to change the site's designation from Commercial Manufacturing Industrial to Regional Center Commercial (discussed further below), which would automatically amend the corresponding Redevelopment Plan designation and be consistent with the site's designation within the General Plan Framework, the latter designation is discussed herein as well. Pursuant to Section 506.2 of the Hollywood Redevelopment Plan, Regional Center Commercial land uses are required to "provide goods and services which are designed in a manner that appeals to a regional market as well as to local markets and includes uses such as theaters, restaurants, hotels, offices, and retail or service businesses." Residential uses are expressly permitted and "encouraged within the Regional Center Commercial land use designation" pursuant to Section 506.3 of the Hollywood Redevelopment Plan. Applicable goals and provisions of the Hollywood Redevelopment Plan and an associated consistency analysis for the project is provided in Table IV.F-3 on page IV.F-42 in the impact analysis below.

(d) City of Los Angeles Adaptive Reuse Incentive Area

The City's Adaptive Reuse Incentive Areas Specific Plan (Adaptive Reuse Plan), established by Ordinance No. 175,038, applies to the entire Hollywood Redevelopment Area as well as several other areas of the City. The purpose of the Adaptive Reuse Plan is to facilitate the rehabilitation and reuse of existing underutilized, neglected, or historically significant structures for residential, live/work, or hotel-related uses. Such conversions are intended to minimize building vacancies, preserve the area's architectural and cultural fabric, and promote mixed-use communities, with a resulting beneficial effect on the jobs/housing balance, vehicle trips, and air quality. Buildings eligible for conversion must be non-residential and include historically significant buildings, buildings constructed prior to July 1, 1974, and others deemed eligible by the Zoning Administrator. Project permit compliance review is not required for projects permitted pursuant to the Adaptive Reuse Plan.

Because the project would not involve the conversion of existing buildings within the Columbia Square Complex to residential or hotel uses, but rather would provide for adaptive reuse for office, retail, and entertainment-related studio uses (as described further below), the provisions of the Adaptive Reuse Plan do not apply to the project.

(e) City of Los Angeles State Enterprise Zone

The State of California Legislature approved the Enterprise Zone Act in 1984 to establish a program to provide tax incentives and benefits to stimulate employment generation, business and industrial growth, and investment in economically depressed areas throughout the State. An Enterprise Zone (EZ) is an area in which businesses are eligible for special tax incentives and benefits not available to businesses located outside the EZ.

The City of Los Angeles has three approved State Enterprise Zones (EZ): the East Los Angeles Zone, the Harbor Zone, and the Los Angeles Zone where the project site is located. The City of Los Angeles offers the following incentives to businesses within an EZ: hiring credits, sales & use credits, expense and interest deductions, DWP rate discount, fee waivers for site plan review of major development projects, sewer facility discounts, and reduced parking rates.[8] The goal of the incentives is to stimulate business investment and growth and increase employment opportunities within economically disadvantaged areas of the City.

(f) Recent City Industrial Policy Initiatives and the Industrial Land Use Policy Project

The City of Los Angeles General Plan Framework and various Community Plans include policies to preserve industrial land for industrial and job-generating purposes. To assist in managing the conversion and underutilization of industrial land, several initiatives and studies have been underway by the City within the past several years, including the City's Industrial Development Policy Initiative. Initiatives provided in the Industrial Development Policy Initiative include: (1) to retain, and cultivate quality industrial jobs, particularly for local residents; (2) to encourage retention, expansion, and development of industrial businesses; (3) to identify, protect and optimize the industrial use of prime industrial areas; and (4) to increase the City's revenues from industrial activity. The Industrial Development Policy Initiative indicates that 8 percent of the City's land (when excluding the Port of Los Angeles and LAX) is comprised of industrial-zoned land, with 47 percent of such land comprised of industrial uses, 10 percent comprised of institutional uses, 8 percent comprised of retail uses, and 4 percent comprised of residential uses. Data also indicate that as much as 9.4 percent of the industrial zoned land may be vacant. In addition, approximately 3 percent of the City's non-industrial zoned acreage is used for

[8] *City of Los Angeles Community Development Department, State Enterprise Zones, online at: http://www.lacity.org/CDD/bus_statecred.html.*

industrial purposes, representing nearly 35 percent of the City's industrial defined activity. Such land includes the project site, which is zoned C4 Commercial but designated Commercial Manufacturing Industrial and currently developed with television studio uses.

Following preparation of the Industrial Development Policy Initiative, the Industrial Land Use Policy (ILUP) project was formed and is being conducted. The ILUP is a comprehensive study of the use of industrial-zoned land within the City of Los Angeles. Specifically, in order to ensure appropriate development and foster a diverse economy, the Department of City Planning and the CRA were instructed to undertake a study of the use of industrial-zoned land in the City and provide policy recommendations to guide future land use decisions. In February 2006, Planning Department staff began surveying existing land uses within certain industrial areas in the City, including Hollywood, as part of the ILUP. In November 2006, a set of preliminary conclusions were released and additional analysis and research was conducted to address issues raised during the review process. Subsequently, a January 3, 2008 Memorandum on Staff Direction Regarding Industrial Land Use and Potential Conversion to Residential or Other Uses (ILUP Memo) was prepared by the Planning Department and CRA. The preliminary Industrial Land Use Survey Report prepared in May 2006 indicated that the industrial properties within the project area support primarily light industrial uses related to entertainment production, which is considered an important growth industry.[9] The report further indicated that such uses are considered compatible with the surrounding residential and commercial uses in the area.

The ILUP Memo emphasizes that the City's adopted policy is to retain industrial-zoned land for job-producing uses. The memorandum categorizes industrial-zoned land in specific areas of the City into four typologies:

- Employment Protection Districts – Areas where industrial zoning should be maintained and industrial land use designations should continue to be implemented. No housing should be allowed within these districts

- Industrial Mixed-Use Districts – Areas that should remain predominantly industrial/employment districts. Some limited, secondary residential uses may be supported.

- Transition Districts – Areas where industrial uses are no longer viable; major investment has taken place through other efforts and residential may be appropriate.

[9] *Los Angeles City Planning Department, Industrial Land Use Survey, Hollywood Survey Area Report, May 2006.*

- Correction Areas – Areas where conflicts currently exist between residential and industrial and need to be corrected.

With regard to projects located within an Industrial Mixed Use District, the ILUP Memo recommends approval of the conversion of industrial land to other uses and approval of a development comprising residential uses only if it includes a jobs-producing component and other community benefits in order to ensure that such districts remain primarily jobs-producing lands. Community benefits suggested for staff consideration include aspects such as relocation consultation for displaced businesses, a job training assistance fund, a minimum jobs-producing space, affordable housing, open space, and infrastructure improvements. The ILUP Memo is also intended to provide general long-term directions to City staff as they undertake community plan updates and consider rezoning of land. Implementation of the ILUP and long-term direction of the ILUP Memo with regard to industrial-zoned land in the Hollywood area is expected to coincide with the Hollywood Community Plan update, which is currently underway. It should be noted that neither the ILUP Project nor the ILUP Memo takes an action that changes the current land use designations or zoning with respect to industrial land. As further clarified in a memorandum from the City of Los Angeles Department of City Planning (ILUP Clarification Memo) dated February 22, 2008, the ILUP Memo was not intended to predetermine land use decisions or presuppose any future land use changes.[10] The ILUP Clarification Memo emphasizes that any land use decisions should be based on a thorough understanding of the complexities involved in each individual case and the significance of industrial lands. Furthermore, the ILUP Clarification Memo states that the community benefits are not requirements that can be imposed by the Planning Department. The community benefits directive in the ILUP Memo was mainly aimed at City staff who are handling projects within the Redevelopment Areas.

The project site is not zoned for industrial uses, and thus, is not included in the Industrial Land Use Survey map for the Hollywood area, as the survey focused strictly on land zoned for industrial use.[11] However, the project site is designated as Commercial Manufacturing Industrial within the General Plan. With regard to industrial land not included in the Industrial Land Use Survey Report, the ILUP Memo provides staff direction to "retain industrial land designation, pursuant to adopted City policy".

[10] *Memorandum from Gail Goldberg of the City of Los Angeles' Department of City Planning to the Honorable City Council of the City of Los Angeles, February 22, 2008.*

[11] *Los Angeles City Planning Department, Industrial Land Use Survey: Hollywood Area, Preliminary Staff Recommendations 3-29-06, dated May 2006.*

(2) Regional Plans

Regional land use plans that govern the project area include the Southern California Association of Governments' (SCAG) Regional Comprehensive Plan and Guide (RCPG), Regional Transportation Plan (RTP), and Growth Vision Report; and the Los Angeles County Congestion Management Plan (CMP), administered by the Los Angeles County Metropolitan Transportation Authority (Metro), which regulates regional traffic issues. In addition, the South Coast Air Quality Management District (SCAQMD) administers the Air Quality Management Plan (AQMP), which addresses attainment of State and federal ambient air quality standards throughout the South Coast Air Basin.

(a) SCAG Regional Comprehensive Plan and Guide, Regional Transportation Plan, and Growth Vision Report

SCAG is a joint powers agency with responsibilities pertaining to regional issues. SCAG's responsibilities include preparation of the RCPG in conjunction with its constituent members and other regional planning agencies. The current RCPG, adopted in 1996, is intended to serve as a framework for decision-making with respect to regional growth that is anticipated through the year 2015 and beyond, including growth management and regional mobility.[12] In addition, the RCPG proposes a voluntary strategy for local governments to use in addressing issues related to future growth and in assessing the potential impacts of proposed development projects within the regional context. For planning purposes, the SCAG region has been divided into 14 subregions. The project site is located within the Los Angeles City subregion.

SCAG reviews environmental impact reports of regionally significant projects to determine consistency with regional plans. The criteria for determining whether a project is regionally significant are set forth in the CEQA Guidelines. According to CEQA Guidelines Section 15206, since the project involves a request for a General Plan Amendment (discussed below) and would employ more than 1,000 people, it is considered regionally significant. Thus, RCPG policies that relate to the project are discussed in Table IV.F-4 on page IV.F-47 in the analysis of impacts below.

SCAG's 2008 Regional Transportation Plan (RTP), adopted in May 2008, presents a long-term transportation vision through the year 2035 for the six county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The 2008 RTP was produced through a balanced approach that considered system preservation, system operation and management, improved coordination between land-use decisions and transportation investments, and strategic expansion. The 2008 RTP presents an investment framework for addressing the region's transportation and related challenges. Specific issues

[12] *On November 1, 2007, a Draft 2008 Regional Comprehensive Plan was released for public review and comment. This document has not yet been adopted.*

addressed within the 2008 RTP include mobility challenges, air quality challenges, climate change, energy, transportation finance challenges, security and safety, environmental justice and mitigation, revenues and expenditures, transportation conformity, implementation and monitoring, corridor preservation, and future connections and growth. The RTP provides a basic policy and program framework for long-term investment in the regional transportation system in a coordinated, cooperative and continuous manner. Transportation investments in the SCAG region that receive State or federal transportation funds must be consistent with the RTP and must be included in the Regional Transportation Improvement Program (RTIP) when ready for funding. The RTP goals that relate to the project are discussed in Table IV.F-4 in the analysis of impacts below.

In an effort to maintain the region's prosperity, continue to expand its economy, house its residents affordably, and protect its environmental setting as a whole, SCAG has collaborated with interdependent sub-regions, counties, cities, communities, and neighborhoods in a process referred to by SCAG as Southern California Compass, which resulted in the development of a shared Growth Vision for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG began Compass in 2002, spearheaded by the Growth Visioning Subcommittee, which consists of civic leaders from throughout the region. The shared regional vision sought to address issues such as congestion and housing availability, which may threaten the region's livability.

The underlying goal of the growth visioning effort is to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income. To organize the strategies for improving the quality of life in the SCAG region, a series of principles was established by the Growth Vision Subcommittee. These goals are contained in the Growth Vision Report adopted in June 2004. The four principles are intended to promote and maximize regional mobility, livability, prosperity, and sustainability. Decisions regarding growth, transportation, land use, and economic development should support and be guided by these principles. Specific policy and planning strategies also are provided as a way to achieve each of the principles. The project's consistency with the Growth Vision goals is discussed in Table IV.F-3 below.

In addition, the Compass Blueprint 2% Strategy provides guidance for how and where SCAG can implement the Growth Vision for Southern California's future. It calls for modest changes to current land use and transportation trends on only two percent of the land area of the region – referred to as 2% Strategy Opportunity Areas. These are key parts of the region for targeting growth, where projects, plans and policies consistent with the Compass Blueprint principles would best serve the goals of the Growth Vision. As indicated on the 2% Strategy Opportunity Areas map for the City of Los Angeles – Central, the project site is located within a Compass 2% Strategy Opportunity Area.

(b) SCAQMD Air Quality Management Plan

SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. The SCAQMD is responsible for bringing air quality in the South Coast Air Basin (Basin) into conformity with federal and State air pollution standards. The SCAQMD is also responsible for monitoring ambient air pollution levels throughout the Basin and for developing and implementing attainment strategies to ensure that future emissions will be within federal and State standards. The SCAQMD's AQMP, last amended in 2003, presents strategies for achieving the air quality planning goals set forth in the Federal and California Clean Air Acts (CCAA), including a comprehensive list of pollution control measures aimed at reducing emissions. Further discussion of the AQMP can be found in Section IV.B, Air Quality, of this EIR.

(c) Metro Congestion Management Program

The Los Angeles County Metropolitan Transportation Authority (Metro) administers the Los Angeles County Congestion Management Program (CMP), a State-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. The CMP, last revised in 2004, includes a hierarchy of highways and roadways with minimum level of service standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven-year capital improvement program, and a county-wide computer model used to evaluate traffic congestion and recommend relief strategies and actions. CMP guidelines specify that those designated roadway intersections to which a project could add 50 or more trips during either peak hour be evaluated. The guidelines also require evaluation of freeway segments to which a project could add 150 or more trips in each direction during peak hours. The CMP is discussed further in Section IV.I, Transportation and Circulation, of this EIR.

3. Project Impacts

a. Methodology

The analysis of potential land use impacts considers consistency of the project with adopted plans and policies that regulate land use on the project site, as well as the compatibility of proposed uses with surrounding land uses. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning documents that regulate land use or guide land use decisions pertaining to the project site. CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. Evaluations are made as to whether a project is inconsistent with such plans. Projects are considered consistent with General Plan provisions and general SCAG policies if they are

compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The intent of the compatibility analysis is to determine whether the project would be compatible in relation to use, size, intensity, density, scale, and other physical and operational factors. The analysis is also intended to determine whether existing communities or land uses would be disrupted, divided, or isolated by the project and consider the duration of any disruptions. The compatibility analysis is based on aerial photography, land use maps, and field surveys in which surrounding uses have been identified and characterized. The analysis addresses general land use relationships and urban form, based on a comparison of land use relationships in the project area under existing conditions at the time of the Notice of Preparation (NOP) to the conditions that would occur with project implementation.

b. Significance Thresholds

The following factors affecting a determination of potential significance will be applied to the project as set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, for consideration on a case-by-case basis:

(1) Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the Hollywood Community Plan.
- Whether the proposal is inconsistent with the adopted goals and provisions of the Hollywood Redevelopment Plan.
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

Based on the factors presented above, the project would be considered to have a significant land use consistency impact if it was found to be in substantial conflict with the adopted Community Plan, Redevelopment Plan, or with the whole of relevant environmental policies in other applicable plans.

(2) Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area.
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions.

- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project.

Based on the factors presented above, the project would be considered to have a significant land use compatibility impact if it would substantially and adversely change the existing relationships between numerous land uses or properties in a neighborhood or community or have the long-term effect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation.

c. Project Design Features

The project would provide a vertically integrated mix of uses that will assist in promoting Hollywood as a center of population, employment, retail services and entertainment. Specifically, the project would provide 400 residential units, a 125-room hotel, approximately 380,000 square feet of office space , and approximately 41,300 square feet of retail space and restaurant/bar uses (including restaurant/bar uses in the hotel) would be provided on a 4.68-acre site located at the northwest corner of Sunset Boulevard and Gower Street. Of this floor area, approximately 105,510 square feet of the existing 136,233-square-foot Columbia Square Complex located along Sunset Boulevard would be retained and renovated for office (which would include entertainment-related office and studio uses), retail, and restaurant/bar uses.

In addition, a substantial part of the project would include landscaped courtyards, pathways and other open space features connecting the various uses in order to establish a pedestrian-oriented environment within the project vicinity. Amenities such as recreation rooms, swimming pools, and landscaped recreational areas would also be provided for residents and guests. Further, the project would include a multi-level parking structure (including three subterranean levels and six upper levels) providing approximately 2,004 parking spaces. The parking structure would be physically integrated within the interior of the project site and, with the exception of vehicular access points, would not be visible from the adjacent public rights-of-way. Please refer to Figure II-4 in Section II, Project Description, of this EIR for an illustration of the proposed site plan. It is anticipated that construction of the project would commence in 2009 with completion in 2013.

The residential component of the project would consist of 400 multi-family residential units located within several buildings ranging in height from 8 to 40 stories and sited in the northern portion of the site along El Centro Avenue, Selma Avenue, and Gower Street. A 40-story residential tower, located in the northwest corner of the site, would reach a building height of approximately 447 feet, with other elements such as architectural features extending to 512 feet. Town homes would be located within eight-story buildings along Selma Avenue, as well as on the on the top two stories (7th floor and 8th floor) of the eight-story building fronting Gower Street, above proposed office uses. The residential

uses would comprise a total of 586,000 square feet of floor area including lobby areas, vestibules, stairs, and residential storage.

The project's hotel component would be located along El Centro Avenue just south of and below the residential tower and would include 125 rooms within seven stories totaling approximately 75 feet. The hotel uses would consist of approximately 98,500 square feet of floor area, including ancillary uses such as the lobby, registration desk, hotel office, restaurant and bar, and laundry areas. Amenities including a swimming pool and landscaped recreational areas for guests would be provided on the podium level.

The proposed office uses would be located within buildings ranging in height from one story to 14 stories, located primarily in the southern portion of the project site along El Centro Avenue, Sunset Boulevard, and Gower Street. The 14-story high-rise office building would be located near the southeast corner of the site along Gower Street and would be approximately 204 feet tall, with other elements such as architectural features extending to 260 feet. In addition, office uses would be located on the first six floors of the eight-story building along Gower Street, described above. As shown on Figure II-3 in Section II, Project Description, the existing Radio Building, Studio A, and Television Building of the Columbia Square Complex fronting Sunset Boulevard would remain and would be rehabilitated. Overall, the project proposes approximately 380,000 square feet of office space, of which 91,110 square feet would be comprised of rehabilitated office space within the existing Columbia Square Complex.

A two-story restaurant is also proposed near the southwest portion of the project site along El Centro Avenue, and retail uses and a café would be located on the ground floor of the 14-story office building. In addition, retail and restaurant/bar uses would be provided as part of the hotel on the ground floor and would also be located on the podium level (7^{th} floor) of the residential tower. The project would include a total of approximately 41,300 square feet of retail and restaurant/bar space, of which 14,400 square feet would be comprised of rehabilitated retail and restaurant/bar space within the existing Columbia Square Complex.

The project would also include a nine-level parking structure with approximately 2,004 parking spaces, located within the central portion of the site. The three lower levels of the parking structure would be subterranean, while the six upper levels would begin from ground level and form the podium upon which the residential tower and town homes would be located (the podium level would thus comprise the 7^{th} floor of project). Vehicular access to the parking facility would be provided via El Centro Avenue, Selma Avenue, and Gower Street. As previously mentioned, the parking structure would be physically integrated with surrounding development within the interior of the site such that the structure would be surrounded by the residential tower to the west, town homes to the north, and office uses

and town homes to the east and, therefore, would generally not be visible from off-site locations.

The project would provide substantial open space, landscaping, and amenities for project residents, guests, and tenants, as well as for the general public. Publicly accessible landscaped open space would consist of two public courtyards and a pocket park on the ground level. One of the public courtyards would consist of the existing courtyard fronting Sunset Boulevard (the Sunset Courtyard) that is a part of the Columbia Square Complex. As part of the project, this courtyard would be renovated, re-landscaped, and reintroduced as a new pedestrian-oriented amenity for the greater community. The second courtyard would be located at the northwest corner of the site and would be enhanced with pedestrian pathways and accent paving. The pocket park would be located in the northeast corner of the project site (at the corner of Selma Avenue and Gower Street). More specifically, the new courtyard would connect to other green spaces on-site and create a walkable district, enabling residents and visitors to walk through and enjoy a vast majority of the project site. Additional amenities provided for project residents and/or guests would include fitness and recreation rooms, large central courtyards and gardens on the podium level, two swimming pools, entertaining patios, sunning areas, and landscaped recreational areas. Overall, the project would provide approximately 59,000 square feet of public/common open space and approximately 17,400 square feet of private open space, which represents approximately 40 percent of the overall project site.[13] Landscaping, including several ornamental trees, would be provided along the perimeter of the site as well along pedestrian walkways throughout the site.

Implementation of the project would require several discretionary actions including but not limited to: Community Redevelopment Agency Board approval to develop up to 5.42:1 FAR; Community Redevelopment Agency Board approval of an Owner Participation Agreement (OPA) to permit development in excess of a 4.5:1 FAR; City approval of a Development Agreement; a General Plan Amendment to permit the Regional Center Commercial land use designation in lieu of the existing Commercial Manufacturing designation and pursuant to Hollywood Community Plan Map Footnote 9, to permit a floor area ratio of 5.42:1;[14] a Vesting Zone Change to change the existing [Q]C4-1VL-SN Zone to C4-2-SN; a Height District Change to permit Height District Number 2, in lieu of Height

[13] *Open space is based on the definition of open space provided in Section 12.21 of the LAMC and includes common and private open space areas. Please refer to Section IV.G.5, Parks and Recreation, for further discussion.*

[14] *Section 506.2.3 of the Hollywood Redevelopment Plan states in part that development within the Regional Commercial designation shall not exceed the equivalent of an average floor area ratio of 4.5:1 for the entire area so designated. The City is currently in the process of updating the Hollywood Community Plan (in which the project site is located). It is not known at this time whether the project site will be redesignated pursuant to the Hollywood Community Plan update. Depending on the outcome of the City's Community Plan update, the project may be required to obtain a subsequent General Plan amendment.*

District IVL. In addition, a Vesting Conditional Use Permit (CUP) for a mixed use development and a Vesting CUP to permit: (1) motion picture and television studios in a C4 Zone; (2) a hotel within 500 feet of an R zone (3) live entertainment/patron dancing; and (4) on- and off-site site sales and consumption of a full line of alcoholic beverages. The Project Applicant is also seeking Site Plan Review approval to allow a project that: creates a net increase of 50,000 gross square feet or more of non-residential floor area; creates an increase of 50 or more dwelling units; and/or adds 1,000 or more average daily vehicle trips. In addition, the project would require City Planning approval to allow a phased development that will be constructed in consecutive or overlapping phases over a 10-year period. Other approvals required include: a zone variance to allow an outdoor restaurant not on the ground floor; a Vesting Tentative tract map; demolition, grading, excavation, foundation, and associate permits; haul route approval; Encroachment Permit to encroach approximately 5 feet underneath Gower Street to construct a portion of the parking structure; signage approvals pursuant to the guidelines and policies of the HSSUD; certification of an EIR and adoption of a Mitigation Monitoring and Reporting program; coverage under the National Pollution Discharge Elimination System Permit, and ministerial permits.

d. Analysis of Project Impacts

(1) Consistency with Local Plans and Applicable Policies

As discussed above, project development would be subject to numerous local land use plans and programs, as well as applicable development standards set forth in the City's Municipal Code. The project's consistency with the requirements and policies of the Los Angeles General Plan, General Plan Framework, Hollywood Community Plan, LAMC, Hollywood Redevelopment Plan, and the City's Enterprise Zone is addressed below.

(a) City of Los Angeles General Plan

The project is a mixed-use development, which includes residential, hotel, office, retail, and restaurant/bar uses. As previously discussed, the Hollywood Community Plan designates the project site for "Commercial Manufacturing Industrial" land uses, which correspond to the CM and P Zones. As the site is zoned for C4 commercial uses and designated as a Regional Center within the General Plan Framework, the current land use designation is inconsistent with the site's other designations. In order to construct a residential development that would provide much needed housing to households with varying needs, the project would require an amendment to the General Plan land use designation.

Pursuant to LAMC Section 11.5.6, the Project Applicant seeks a General Plan Amendment to amend the adopted Hollywood Community Plan's land use designation for the site from Commercial Manufacturing to Regional Center, with a floor area ratio of 5.42:1

pursuant to Footnote No. 9 of the Hollywood Community Plan Map.[15] The purpose of the General Plan Amendment request is to reflect the existing and proposed scale of development in the surrounding area and to specifically allow a greater intensity of development on the subject property. Granting the requested General Plan Amendment to change the project site's land use designation to Regional Center (with corresponding zones of C2, C4, P and PB) is desirable since the proposed designation would be consistent with the zoning and other designations for the site, including the General Plan Framework designation. In addition, the proposed land use designation would correspond to the designation of many of the properties in the surrounding area, especially those along Sunset Boulevard. The proposed General Plan Amendment would also increase the maximum FAR in order to allow a mixed-use project with commercial and residential components at the proposed density.

The following addresses the ways in which the project would comply with Los Angeles City Charter Section 556 in that it would be in substantial conformance with the purposes, intent and provision of the General Plan and all its elements.

(i) General Plan Framework Element

The project's consistency with the goals, objectives and policies set forth in the General Plan Framework's Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, and Transportation Chapters is analyzed in Table IV.F-1 on page IV.F-23. As demonstrated therein, the project would be substantially consistent with the goals, objectives and policies of the General Plan Framework.

To summarize, the project would support the General Plan Framework of the General Plan as it would assist in improving "the jobs and housing relationships in sub-areas of the City through the re-use of commercially zoned corridors and development [near] transit stations which afford the opportunity for the development of a mix of uses, housing, local retail, and offices, and can improve localized jobs and housing relationships."

By enabling the development of a supply of housing in close proximity to jobs and services, the proposed General Plan Amendment and associated zone change would be consistent with the applicable goals and policies of the General Plan Framework. For instance, the Land Use chapter of the Framework Element identifies objectives and supporting policies relevant to the project site. Those objectives and policies seek, in part,

[15] *Section 506.2.3 of the Hollywood Redevelopment Plan states in part that development within the Regional Commercial designation shall not exceed the equivalent of an average floor area ratio of 4.5:1 for the entire area so designated. The City is currently in the process of updating the Hollywood Community Plan (in which the project site is located). It is not known at this time whether the project site will be redesignated pursuant to the Hollywood Community Plan update. Depending on the outcome of the City's Community Plan update, the project may be required to obtain a subsequent General Plan amendment.*

Table IV.F-1
Consistency of Project with Applicable Policies
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The project would contribute to the existing diversity of uses in Hollywood by providing residential, hotel, office and community-serving retail and restaurant uses, along with open-air and pedestrian amenities. The project would expand the number and type of residential units and retail options within the local vicinity, thus serving needs of the City's existing and future residents and businesses.
Policy 3.1.3: Identify areas for the establishment of new open space opportunities to serve the needs of existing and future residents. These opportunities may include a citywide linear network of parklands and trails, neighborhood parks, and urban open spaces.	**Consistent.** The project would include two public courtyards/plazas, a pocket park, and recreation areas for project resident/guest use with swimming pools, entertaining patios, and sunning areas, collectively totaling approximately 76,400 square feet of active and passive recreation and open space. While the majority of these open space and recreation areas would be located on the podium level, the 3,000-square-foot pocket park (located in the northeast portion of the project site at the corner of Selma Avenue and Gower Street) and a 18,400-square-foot plaza and associated courtyard (located in the southern portion of the project site adjacent to Sunset Boulevard) would be located on the ground level and would be accessible to the public at large. Landscaping, including 96 ornamental trees, would also be provided along the perimeter of the site, in the pocket park and courtyards, the common recreation areas, as well along pedestrian walkways throughout the site.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	**Consistent.** The project site is located within Hollywood, a high density area featuring a mix of land uses including residential, retail, restaurants, entertainment, banking and other commercial offices and services. Development of the proposed mix of uses would expand the land use diversity within the area and serve the needs of existing and future residents. The location of the proposed residential units within close proximity to places of employment, services, and other facilities, as well as being well-served by public transit provided by Metro and LADOT, including the Hollywood and Vine Red Line Station, would provide opportunities for the use of alternative modes of transportation. The convenient location of such services and proposed mix of uses would promote an improved quality of life by facilitating a reduction in vehicle trips and miles traveled.

Table IV.F-1 (Continued)
Consistency of Proposed Project with Applicable Policies
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The project would include landscaped pedestrian walkways and courtyards throughout the site for the public as well as project residents/guests. In particular, the existing plaza fronting Sunset Boulevard that is a part of the Columbia Square Complex would be renovated and reintroduced as a new pedestrian-oriented amenity for the greater community, connecting to other green spaces on-site and creating a walkable district. The project would include the development of new residential units, a hotel, offices, and community-serving retail and restaurant uses. This proposed mix of uses would facilitate pedestrian access to local shopping and dining opportunities for project residents and visitors. Additionally, public transit facilities provided by Metro and LADOT within the local vicinity would offer alternative modes of transportation. Furthermore, the project would not conflict with any bicycle plans in the project vicinity, as no bicycle lanes would be removed as part of the project.
Policy 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	**Consistent.** The project would enhance and improve the aesthetic appeal of the site and surrounding area by removing unsightly surface parking, renovating a variety of potentially historic buildings, and integrating them within the context of new higher density development. The project, with its substantial landscaped open space elements, including publicly accessible courtyards and a garden, would represent a positive contribution to the urban elements of the surrounding cityscape. The project would also provide for expanded gathering places and new retail shops and restaurants that would serve the local area. The transitional heights of the project would maintain the existing low-rise buildings in the southern portion of the site, permit mid- to high-rise buildings throughout the central and northern portions of the site, and concentrate the tallest component of the project in the northwest corner of the site, furthest from Sunset Boulevard and existing residential uses to the east. This vertical vernacular would provide a transition between the surrounding commercial and more distant residential uses while allowing for a higher density development within the site.

Table IV.F-1 (Continued)
Consistency of Project with Applicable Policies
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.	**Consistent.** Consistent with Objective 3.7, the project would include 400 new multi-family residential units in the Hollywood Community Plan Area of the City of Los Angeles. The project would address the housing shortage that currently exists throughout the City and Hollywood in particular.[16] As the project would be located within a developed area of Hollywood, no new major roadways or regional infrastructure (e.g., water or wastewater lines) would need to be developed to service the project. The existing regional infrastructure and the established roadway network are sufficient to serve the project's residential population. The project would be beneficial to the community and to the City in general as it would allow residential development at a higher density along a major bus route while providing community-serving commercial opportunities for future project residents and the existing neighborhood as well. In addition, the project would accommodate a transition between proposed office and studio uses in the southern and eastern portions of the site and the residential uses proposed largely in the northern and northwestern areas of the site. The project's design, including outdoor courtyards, pedestrian circulation areas, and common spaces incorporating landscaping and public amenities, would encourage pedestrian activity and improve the quality of life for Hollywood's residents, shoppers, and visitors.
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 contribute to the existing diversity of uses in Hollywood by providing residential, hotel, office, and community-serving retail and restaurant uses, along with open-air and pedestrian amenities along a major transportation corridor. The proposed commercial uses would provide numerous job opportunities, and the proposed restaurant and retail would serve needs of the City's area residents and businesses. Further, the design of the project would represent a positive contribution to the urban elements of the surrounding cityscape.

[16] *According to the City of Los Angeles General Plan Housing Element, growth estimates have led to a Regional Housing Needs Assessment (RHNA) allocation for the City of 112,876 new housing units that will be needed during the planning period of 2006-2014 (page 10).*

Table IV.F-1 (Continued)
Consistency of Proposed Project with Applicable Policies
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Policy 3.10.1: Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1and 3-6 [of the General Plan Framework Element]. 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 provide a mix of uses including residential, hotel, office and retail and restaurant uses, all of which would be available to the regional population. The hotel use in particular would serve visitors to Hollywood and the surrounding area. Per Table 3-1 of the General Plan Framework Element, Regional Centers are characterized by uses such as corporate and professional offices, retail commercial uses, personal services, eating and drinking establishments, entertainment, commercial overnight accommodations, multi-family housing (including mixed-use structures combining residential and commercial uses), and small parks. Further, Regional Centers have FARs ranging from 1.5:1 to 6.0:1. The project would be consistent with all of these characteristics.
Policy 3.10.4: Provide for the development of public streetscape improvements, where appropriate.	**Consistent.** Landscaping, including 96 ornamental trees, would be provided along the perimeter of the site, in the pocket park and courtyards, the common recreation areas, as well along pedestrian walkways throughout the site, as depicted in the landscape plans provided in Figures II-9 and II-10 in Section II, Project Description. Overall, a minimum of 25 percent of the project's common open space areas would be planted with ground cover, shrubs, or trees in accordance with LAMC requirements. Additionally, the 3,000-square-foot pocket park (located in the northeast portion of the project site at the corner of Selma Avenue and Gower Street) and the landscaped 18,400-square-foot plaza and associated courtyard (located in the southern portion of the project site adjacent to Sunset Boulevard) would be located on the ground level and would be accessible to the public at large.
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.** While the project does not include any formally designated parks, it would provide a pocket park and two courtyards that would be open to the public. In particular, the existing plaza fronting Sunset Boulevard that is a part of the Columbia Square Complex would be renovated and reintroduced as a new pedestrian-oriented amenity for the greater community, connecting to other green spaces on-site and creating a walkable district.

Table IV.F-1 (Continued)
Consistency of Project with Applicable Policies
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Policy 3.10.6: Require that Regional Centers be lighted to standards appropriate for nighttime access and use.	**Consistent.** The project would comply with applicable lighting standards to ensure adequate visibility and the safety of project residents and visitors.
Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**Consistent.** As discussed above, the project's design, including outdoor walkways, public courtyards and a garden, and common spaces incorporating landscaping and public amenities, would encourage pedestrian activity.
Housing Chapter	
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City sub-region to meet the twenty-year projections of housing needs.	**Consistent.** The project would include 400 multi-family residential units. The building density necessary to permit this intensity of housing in conjunction with the other proposed uses would require a General Plan Amendment. The project would provide a mix of various sized units. The provision of new housing as part of the project would help address the housing shortage that currently exists throughout the City and Hollywood in particular.[17]
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher density development and surrounding lower density residential neighborhoods.	**Consistent.** The project would locate 400 residential units within an area that is well served by existing transit facilities. The project site is adjacent to the Sunset Boulevard transit corridor and near the Hollywood Boulevard transit corridor. Nearby transit hubs include a high capacity Metro Rapid Bus stop and Hollywood and Vine Red Line Station. The project would retain the low-rise development on-site along Sunset Boulevard while transitioning to mid- to high-rise buildings in the northern portion of the site. The location of high-density housing in a commercial area such as the project vicinity would increase housing within the community while preserving the lower density residential neighborhoods.

[17] *According to the City of Los Angeles General Plan Housing Element, growth estimates have led to a Regional Housing Needs Assessment (RHNA) allocation for the City of 112,876 new housing units that will be needed during the planning period of 2006-2014 (page 10).*

Table IV.F-1 (Continued)
Consistency of Proposed Project with Applicable Policies
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Urban Form and Neighborhood Design Chapter	
Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.	**Consistent.** The project represents an investment in new urban housing and commercial development featuring contemporary architecture and modern amenities. By locating residential units and hotel uses in close proximity to jobs, transit, office space, shops, and restaurants, the project would enhance the quality of life for residents, workers, and visitors to the area. The Hollywood area is characterized by a range of housing types, including single-family, mid-size, and high-rise apartments and condominiums, and large-scale commercial development. The project would be consistent with these uses. Additionally, development of new retail stores, restaurants, and common areas would increase shopping and dining options for the community and provide an opportunity for continued investment in the surrounding local Hollywood vicinity.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**Consistent.** The project would incorporate various elements to promote individual and community safety. Such features include but are not limited to implementation of the Construction Staging and Traffic Management Plan and coordination with the LAPD to ensure emergency response access to the project site is maintained; lighting of parking structures, elevators, and lobbies to reduce areas of concealment; lighting of building entries and pedestrian walkways to provide for pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings; and secured access entry for residents of the project.
Open Space and Conservation Chapter	
Policy 6.4.8: Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods. a. Encourage the development of public plazas, forested streets, farmers markets, residential commons, rooftop spaces, and other places that function like open space in urbanized areas of the City with deficiencies of natural open space, especially in targeted growth areas.	**Consistent.** The project would include approximately 76,400 square feet of public and private open space throughout the project site, including a pocket park, public courtyards and a garden, common recreation areas, and landscaped pedestrian connections. The open space represents approximately 40 percent of the overall project site area. The residential component of the project would exceed the open space requirements of the LAMC (discussed below). Residential recreational amenities would include fitness and recreation rooms, swimming pools, entertaining patios, and sunning areas.

Table IV.F-1 (Continued)
Consistency of Project with Applicable Policies
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Economic Development	
Goal 7B: A City with land appropriately and sufficiently designated to sustain a robust commercial and industrial base.	**Consistent.** As part of the project, a General Plan Amendment is requested to change the current land use designation from Commercial Manufacturing (which is inconsistent with the site's zoning) to Regional Center, which is consistent with surrounding conditions. As previously discussed, the project would create new shopping and dining opportunities, generate jobs, and improve the jobs/housing balance in the area. In addition, the project would redevelop a substantial portion of the site that has been underutilized for many years and used for surface parking.
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	**Consistent.** The project would provide for the development of 400 residential units and community-serving retail and restaurant uses, along with other commercial office and hotel uses. The project's commercial component would expand the number and type of commercial and retail options within the local vicinity, thus serving needs of the City's existing and future residents and businesses. As discussed throughout the analyses presented within this EIR, the project has also been designed to minimize environmental impacts.
Policy 7.2.3: Encourage new commercial development in proximity to rail and bus transit corridors and stations.	**Consistent.** The project is located on Sunset Boulevard and near Hollywood Boulevard, both major routes with several public bus line stops provided by Metro and LADOT. The project is also located in close proximity to several other transit options including a high capacity Metro Rapid Bus stop and Hollywood and Vine Red Line Station.
Policy 7.8.3: Encourage mixed-use development projects, which include revenue generating retail, to offset the fiscal costs associated with residential development.	**Consistent.** The project includes the development of 400 residential units with approximately 41,300 square feet of community-serving retail and restaurant/bar uses. Thus, the project would generate revenue from retail uses to offset the costs associated with residential development.
Objective 7.9: Ensure that the available range of housing opportunities is sufficient, in terms of location, concentration, type, size, price/rent range, access to local services and access to transportation, to accommodate future population growth and to enable a reasonable portion of the City's work force to both live and work in the City.	**Consistent.** The project would provide a mix of various sized residential units. The project is located on Sunset Boulevard, a major route with several/ public bus line stops. The availability of transit service, as provided by Metro and LADOT, along with the range of unit types would accommodate future population growth and enable a reasonable portion of the City's work force to both live and work in the City.

Table IV.F-1 (Continued)
Consistency of Proposed Project with Applicable Policies
of the General Plan Framework

Goal/Objective/Policy	Analysis of Project Consistency
Transportation	
Policy 3.13: Enhance pedestrian circulation in neighborhood districts, community centers, and appropriate locations in regional centers and along mixed-use boulevards; promote direct pedestrian linkages between transit portals/platforms and adjacent commercial development through facilities orientation and design.	**Consistent.** The project is an infill development within an existing urbanized area and would encourage increased use of public transit given its location on a major transit corridor (Sunset Boulevard). In addition, the project would include common open space areas and pedestrian connections throughout the project site that would encourage pedestrian circulation through the project site. The project would also provide a mix of on-site uses that allow people to accomplish multiple activities (e.g., live, work, shop) in the area, thereby reducing vehicle trips and vehicle miles traveled.
Policy 4.1: Seek to eliminate or minimize the intrusion of traffic generated by new regional or local development into residential neighborhoods while preserving an adequate collector street system.	**Consistent.** The project site is self-contained within an entire city block. Direct access to the commercial and residential uses on-site would be provided via Selma Avenue, El Centro Avenue, and Gower Street, the latter two of which connect to Sunset and Hollywood Boulevards. Travel on nearby residential collector streets would not be necessary to access the site.

Source: Matrix Environmental, 2009.

to provide for the stability and enhancement of multi-family residential neighborhoods and to encourage the development of commercial uses and structures that integrate housing units with commercial uses. The project proposes a mixed-use development that includes residential and commercial uses that would support this objective.

The project also supports the goal to intensify residential developments, as the City "has insufficient vacant property to accommodate the cumulative amount of population growth which has been forecasted." Residentially-zoned land is considered insufficient relative to population growth forecasts, and the Framework suggests that growth and development in the City will likely require the "recycling and/or intensification of existing developed properties or conversion of certain uses." The project would convert an underutilized property to include 400 residential units within a mixed-use setting and, therefore, would be consistent with the goal.

The project would also be compatible with several of the General Plan Framework's objectives and policies regarding the development of mixed-use projects and locating residents near alternative transportation facilities. The project would accommodate a diversity of uses along a major transportation corridor, Sunset Boulevard, and within one-quarter mile of a Metro Red Line station, both of which provide opportunities for alternative transportation. The mix of uses would assist in providing a balance of jobs and housing and would cluster development so as to create an activity center and provide for the efficient provision of infrastructure. The project would also provide an employment population for the surrounding dense urban area. Overall, the project would be generally consistent with the policies and objectives set forth in the General Plan Framework Element.

(ii) Hollywood Community Plan

The Land Use Element of the General Plan comprises 35 Community Plans; the project site is governed by the Hollywood Community Plan. The Hollywood Community Plan designates the site for Commercial Manufacturing. Pursuant to LAMC Section 11.5.6, the Project Applicant seeks a General Plan Amendment to amend the adopted Hollywood Community Plan's land use designation for the project site from the current Commercial Manufacturing industrial land use designation to the Regional Center commercial land use designation.

As discussed above, the current land use designation, which corresponds to the CM and P zones, is inconsistent with the site's C4 commercial zoning and the General Plan Framework designation of Regional Center. In order to construct a residential development that would provide much needed housing to households with varied needs, the project would require an amendment to the General Plan land use designation. Granting the requested General Plan Amendment to change the project site's land use designation to Regional Center (with corresponding zones of C2, C4, P, and PB) is considered desirable

since the proposed designation would be consistent with the zoning and other designations for the project site. In addition, the proposed land use designation would be compatible with the designation of many of the properties in the surrounding area, especially those along Sunset Boulevard. The proposed General Plan Amendment would also permit a greater floor area ratio (FAR) in order to allow a mixed-use project with commercial and residential components at the proposed density.

The project's consistency with the policies set forth in the current Hollywood Community Plan is analyzed in Table IV.F-2 on page IV.F-33. As demonstrated therein, the project would be substantially consistent with the policies of the Hollywood Community Plan. In addition to the applicable policies discussed above, a key objective of the existing Hollywood Community Plan is the provision of housing to satisfy the varying needs and desires of all economic segments of the community. The General Plan Amendment would allow a greater FAR and encourage mixed-use development, which would support this objective by providing much needed housing in conjunction with community-service retail/restaurant uses and other employment generating land uses. It is further noted that while the project site's land use designation would be changed from Commercial Manufacturing Industrial to Regional Center, to the extent that entertainment-related studio uses would be provided for, the project would retain the types of uses currently permitted and present on-site.

In addition, as discussed above, the project site is located in the area referred to in the Community Plan as the Hollywood Center. This area is intended to serve as a commercial and entertainment center for Hollywood and beyond, and mixed residential/commercial developments are specifically encouraged. With the proposed mix of land uses, including office and community-serving retail and restaurant uses combined with residential uses, the project would support and promote the Hollywood Center as the focal point of the community.

The project would also foster community revitalization by renovating several potentially historic buildings and developing an underutilized site with more suitable uses that are compatible with the adjacent commercial and residential neighborhoods. The location of the project would also be advantageous to future residents given the proximity to significant regional employment centers such as Hollywood, Beverly Hills, and downtown Los Angeles via a number of transit options. Overall, based on the discussion above, the project would be generally consistent with the objectives and policies set forth in the Hollywood Community Plan.

Table IV.F-2
Consistency of Project with Applicable Policies
of the Hollywood Community Plan

Policies	Analysis of Consistency
Commerce	
Future development should be compatible with existing commercial development, surrounding residential neighborhoods, and the transportation and circulation system.	**Consistent.** The proposed mix of uses would be compatible with existing uses in the area, which include residential, restaurant/retail, office, entertainment, and other commercial uses. Community-serving retail and restaurant uses would be provided along Sunset Boulevard and El Centro Avenue, with additional retail and restaurant areas within the proposed hotel, the residential tower, and one of the office buildings. In addition, the proposed residential uses would be consistent with the residential uses to the east of the site across Gower Street. Furthermore, the project would be compatible with the transportation and circulation system by locating new residences near existing transit facilities.
The Plan encourages the retention of neighborhood convenience clusters offering retail and service establishments to pedestrians.	**Consistent.** The project would provide approximately 41,300 square feet of retail and restaurant/bar uses. Development of the ground floor restaurant/retail uses along Sunset Boulevard and El Centro Avenue, in conjunction with streetscape and visual enhancement of the site would promote and encourage services that are convenient to nearby residents and pedestrians in the area.
Housing	
The intensity of residential land use in this Plan and the density of the population which can be accommodated thereon, shall be limited in accordance with the following criteria: • The adequacy of the existing and assured circulation and public transportation systems within the area; • The availability of sewers, drainage facilities, fire protection services and facilities, and other public utilities; and • The steepness of the topography of the various parts of the area, and the suitability of the geology of the area for development.	**Consistent.** As the project would be an infill development located within a highly developed area of Hollywood, no new major roadways or regional infrastructure (e.g., water or wastewater lines) would need to be developed. As analyzed in Section IV.I, Transportation and Circulation, of this EIR, the project would incorporate mitigation measures to reduce traffic impacts to the greatest extent feasible. Furthermore, the project would directly benefit from the availability of nearby public transit facilities. Additionally, the project would ensure that the existing sewer, stormwater, and water infrastructure would be adequate to accommodate the demand generated by the project, and the project would not have a significant impact on police or fire services and facilities, as analyzed in the appropriate sections of this EIR. Finally, the project site is characterized by a flat topography and, based on the Geotechnical Study prepared for the site, is considered suitable for the proposed development.
New apartments should be sound-proofed and should be provided with adequate usable open space at a minimum of 100 square feet per dwelling unit excluding parking areas, driveways, and the required front yard setback.	**Consistent.** The project would be constructed using typical construction techniques and materials for noise insulation (e.g., insulated walls and windows, mechanical ventilation, etc.). In addition, the project would meet or exceed the Noise Insulation Standards of Title 24 of the California Code of Regulations by at least 14 percent, which would ensure an acceptable interior noise environment. The project would provide approximately 76,400 square feet of common and private open space for the proposed 400 residential units. This would equate to approximately 191 square feet of open space per dwelling unit, thus exceeding the recommended open space provision of this policy. Please refer to Section IV.H.4, Parks and Recreation, of this EIR for further discussion of the project's provision of open space.

Table IV.F-2 (Continued)

Consistency of Proposed Project with Applicable Policies of the Hollywood Community Plan

Policies	Analysis of Consistency
Circulation	
No increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, major and secondary highways, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated.	**Generally Consistent.** The project proposes a zone change from [Q] C4-1VL-SN to C4-2-SN. As analyzed in Section IV.I, Transportation and Circulation, the project's proximity to public transit would support regional mobility goals and local policies that encourage development near public transportation facilities. While the project would result in significant and unavoidable impacts at the intersections of Gower Street/Sunset Boulevard, Gower Street/ Hollywood Boulevard, Gower Street/Franklin Avenue (A.M. peak hour only), Vine Street/Sunset Boulevard, US-101 Southbound On-ramp/Sunset Boulevard, and Argyle Avenue & Franklin Avenue/US-101 Northbound On-ramp, as well as the neighborhood roadway segments of La Baig Avenue between Harold Way and Sunset Boulevard, Harold Way east of Gower Street, and El Centro Avenue south of Leland Way, the project would incorporate mitigation measures as well as implement a transportation demand management (TDM) program to reduce traffic impacts to the maximum extent feasible and thus, would be generally consistent with the intent of the Community Plan. Furthermore, the project would support the Community Plan's transportation and land use objectives to locate new development in proximity to public transit and along a major transportation corridor.
The Plan recognizes that within the Center Study Areas of Hollywood, innovative parking programs should be instituted to accommodate these Centers' parking needs through creation of more available parking capacity and more efficient use of parking facilities.	**Consistent.** The project would provide approximately 2,004 total parking spaces, which would exceed City parking code requirements. Furthermore, as analyzed in Section IV.I, Transportation and Circulation, the project's proposed parking supply would exceed the projected parking demand.
Service Systems (schools, libraries, etc)	
Such development shall be sequenced and timed to provide a workable, efficient, and adequate balance between land use and service facilities at all times.	**Consistent.** As analyzed in Sections IV.H.1 through IV.H.5, the project site is located in an urbanized area with established service facilities. Public services such as police, fire, schools, and libraries would not be significantly impacted by the project.
No increase in density shall be effected by zone change or subdivision unless it is determined that such facilities are adequate to serve the proposed development.	**Consistent.** As analyzed in Sections IV.H.1 through IV.H.5, public services such as police, fire, schools, and libraries would not be significantly impacted by the project.

Source: Matrix Environmental, 2009.

(iii) Transportation Element

The Transportation Chapter of the General Plan Framework is implemented through the Transportation Element of the General Plan. The Transportation Element serves as a guide that furthers the development of a Citywide transportation system to provide for the efficient movement of people and goods. The Transportation Element recognizes that primary emphasis must be placed on maximizing the efficiency of existing and proposed transportation infrastructure through advanced transportation technology, reduction of vehicle trips, and focused growth in proximity to public transit.

As discussed in Table IV.F-1, the project would be consistent with Transportation Element Policy 3.13 to enhance pedestrian circulation and promote direct pedestrian linkages between transit portals/platforms and adjacent commercial development through facilities orientation and design. The project would be consistent with the Transportation Element by encouraging increased use of public transit and by virtue of its location on a major transit corridor (Sunset Boulevard) and near several multi-modal transportation hubs. The project would also provide a mix of uses that would allow people to accomplish multiple activities in the area. Moreover, because the project is an infill development within an existing urbanized area, it is accessible to multiple existing transit systems.

In addition, the project would be consistent with Transportation Element Policy 4.1 to eliminate or minimize the intrusion of traffic generated by new regional or local development into residential neighborhoods while preserving an adequate collector street system. Direct access to the commercial and residential uses on-site would be provided via Selma Avenue, El Centro Avenue, and Gower Street, the latter two of which connect to Sunset and Hollywood Boulevards. Travel on nearby residential collector streets would not be necessary to access the project site. The locations and design of these access points would minimize intrusion of traffic into the residential neighborhood to the east of the project site (for example, the Gower Street driveways would not align with Harold Way). The Transportation Element also incorporates the City of Los Angeles and Metro's Land Use/Transportation Policy. The Land Use/Transportation Policy, which is provided as Appendix F of the Transportation Element, serves as guidance for future development occurring in transit station areas. The stated objectives of the Land Use/Transportation Policy are to focus future growth of the City around transit stations; increase land use intensity in transit station areas; create a pedestrian oriented environment; accommodate mixed commercial/residential use development; provide places of employment; provide a wide variety of housing; reduce reliance on automobiles; and protect and preserve existing single family neighborhoods. The project would develop a mix of residential and commercial uses on an existing site that is easily accessible to transit services. Thus, as a mixed-use project located within a transit area, the project would foster the use of transit and reduce automobile trips. Additionally, the project would provide housing varying in unit types and design to meet the various housing needs of the area. The project would also

incorporate pedestrian-friendly walkways and courtyard areas to promote a pedestrian oriented environment. Furthermore, the design of the project would respect the residential uses to the east, as the tallest building would be located in the northwest corner of the site. Based on the above, the project would support all of the objectives of the Land Use/Transportation Policy. Overall, the project would be generally consistent with the applicable policies contained in the Transportation Element.

(iv) Housing Element

As discussed above, the General Plan Framework contains a Housing Chapter (Chapter 4, Housing). The project's consistency with the applicable policies in the Housing Chapter is analyzed within Table IV.F-1. The General Plan also contains a Housing Element that is separate from the Framework Element's Housing Chapter. The Housing Element contains objectives and policies that are applicable to the project, as discussed below.

Objective 1.1 of the Housing Element is to encourage the production of an adequate supply of rental and ownership housing for households of all income levels and needs. The requested General Plan Amendment and Zone Change would allow for the development of a large supply of housing in close proximity to commercial activities and employment centers. In addition to the commercial component, which would include community-serving retail and restaurant uses as well as jobs-generating hotel and office uses, the project would add 400 residential units to a commercial corridor in need of additional quality housing without removing any existing housing. The project would also accommodate various residential needs by providing a mix of various sized units.

The project would also be consistent with the Housing Element Objective 2.2 to promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit, and Policy 2.2.1 to encourage the integration of housing with other compatible land uses. The requested Zone Change and General Plan Amendment would allow for the development of an integrated mixed-use project offering jobs, amenities, and housing that would encourage pedestrian activity and the use of nearby transit.

The project would be consistent with Housing Element Policy 2.2.2 to promote sustainable development in public and private open space and street rights-of-ways. The project, with the requested Zone Change and General Plan Amendment, would enhance the public streets by improving adjacent streetscapes and creating a pedestrian-friendly, landscaped environment. It would also replace the existing underutilized surface parking areas of the site with a modern, visually compatible, and appropriately-scaled mixed use development, while also renovating and converting several potentially historic buildings on-site for adaptive reuse.

The project would be consistent with Housing Element Policy 2.2.4 to promote and facilitate a jobs/housing balance at a citywide level, and Policy 2.2.6 to accommodate projected growth to 2014 in a sustainable way, encourage housing in centers and near transit, in accordance with the General Plan Framework Element. The project site is located on a commercial corridor near major commercial and employment centers, which would allow individuals to live in close proximity to places of employment. The requested Zone Change and General Plan Amendment would create a residential and commercial center that would be transit accessible and designed to reduce dependence on the automobile. The project would encourage use of public transit and non-motorized transportation through its proximity to public transit hubs and various employment centers.

Overall, the project would meet many of the housing goals and policies contained in the Housing Element of the Los Angeles General Plan.

(v) Air Quality Element

The 1992 revision of the City's General Plan Air Quality Element serves to aid the greater Los Angeles region in attaining the state and federal ambient air quality standards at the earliest feasible date, while still maintaining economic growth and improving the quality of life. The Air Quality Element and the accompanying Clean Air Program acknowledges the inter-relationships between transportation and land use planning in meeting the City's mobility and clean air goals. With the City's adoption of the Air Quality Element and the Clean Air Program, the City seeks to achieve consistency with regional Air Quality, Growth Management, Mobility, and Congestion Management Plans.

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

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

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

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

> Objective 4.1—It is the objective of the City of Los Angeles to include regional attainment of ambient air quality standards as a primary consideration in land use planning.
>
> > Policy 4.1.1—Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.

As discussed in detail in Section IV.B, Air Quality, of this Draft EIR, development of the project at the proposed site location offers the opportunity to provide residential uses in the midst of a highly urbanized regional employment center and does so via the use of existing infrastructure, proximity to existing regional and local transit facilities, encouragement of pedestrian activity, and a location near existing commercial uses that would meet many of the needs of the project's future tenants and residents. Based upon this evaluation, it is concluded that the project would be consistent with City of Los Angeles air quality policies, as it implements the air quality goals and policies set forth in the City's General Plan. Overall, no significant impacts would occur as a result of project development with respect to compatibility with applicable air quality policies as set forth in the City's General Plan Air Quality Element.

(b) Los Angeles Municipal Code

The general purpose and intent of the zoning regulations is to promote consistent, compatible land use and development and to ensure that the health and safety of the surrounding community is not negatively impacted by potentially incompatible land uses. Such regulations, however, are written on a Citywide basis and do not take into account all of the individual or unique characteristics and circumstances that specific parcels and their intended use(s) may have.

Pursuant to LAMC Section 12.32F, the project includes a Zone Change to eliminate the [Q] Qualified Classification from the site's existing [Q]C4-1VL-SN zone designation and a Height District Change from 1VL to Height District Number 2. The project site's current zoning includes a [Q] condition that specifically prohibits residential uses per Ordinance No. 165,662. The proposed zone change would remove the [Q] condition in order to permit the proposed residential uses. However, all of the other uses proposed as part of the project are permitted on-site per the current zoning requirements. In addition, Height District lVL limits structures on the site to three stories and 45 feet in height. In order to accommodate the proposed mix of uses at the planned density, the project would require the Height District Change to permit unlimited building heights and a maximum FAR of 6:1. Further, the project would require several CUPs, as indicated above in Section 3.c.

With approval of these requests, the project would be consistent with applicable LAMC requirements. Relative to the proposed residential component, the C4 zone permits those residential uses that are permitted in the R4 zone. Based on the 4.68-acre area of the site and the R4 zone requirement of a minimum lot area of 400 square feet per unit, 509 residential units would be permitted on-site. Thus, the project's 400 units would be within the permitted density for the project site. In addition, the proposed height designation would permit the proposed building heights and density. Furthermore, side and rear yard setbacks for the project's residential buildings would be satisfied in accordance with LAMC Section 12.16.

The project would also comply with LAMC Section 12.21.A.4 with regard to parking (see Section IV.I, Transportation and Circulation, of this EIR for further analysis). Specifically, the required number of parking spaces for the proposed uses would be 1,910 spaces, and the project would provide 2,004 parking spaces. It should be noted that this estimate is conservative in that the parking analysis utilized the condominium requirement for all 400 multi-family residential units because condominium uses generate a higher parking rate than apartment uses. Furthermore, the parking analysis concluded that the project's peak hour parking usage would be less than the required and provided number of parking spaces.

The zone and height change request does not propose to change the existing SN designation for the Hollywood Signage Supplemental Use District (HSSUD). Project consistency relative to the HSSUD signage regulations are analyzed in Section IV.A, Aesthetics, of this EIR.

In addition, the proposed television studio uses would be consistent with existing development within the surrounding community given the project site's location within Hollywood, the historic center of the entertainment industry. Nearby uses include the Sunset/Gower Studios to the southeast across Sunset Boulevard, Releigh Studios to the south on Melrose Avenue, and Paramount Studios also on Melrose Avenue. Moreover, the project site is currently improved with television and radio studio uses, which are permitted by CUP under the current zoning designation. Thus, the proposed studio uses would not represent a change in use on-site.

The conditional use permit for the on- and off-site sales and consumption of a full line of alcoholic beverages would be a blanket permit for up to nine alcohol-related uses. The blanket conditional use approval would establish the maximum number of alcohol-serving establishments and locations within the project; establish the types of alcohol-serving establishments allowed within the project site; and establish certain permitted activities within those establishments, such as live entertainment and dancing. The blanket conditional use approval would also require that each operator seek and obtain plan approval from the City's Zoning Administrator before being authorized to serve alcohol

within the project site. The purpose of the plan approval is to ensure that each operator proposes a use that would be consistent and compatible with the blanket conditional use permit. The proposed commercial uses (e.g., sit-down restaurants, lounges, catering establishments) ultimately approved for alcohol sales and consumption would not be out of place with the surrounding uses. Several restaurant/bar and entertainment uses with permits to serve alcohol for on-site consumption are located within close proximity to the project site. Hollywood has long functioned as an entertainment destination location with many theaters, restaurants, and nightclubs in the local area. The project would thus be proper in relation to these adjacent uses and the continued development of the Hollywood Community.

Relative to the proposed hotel use, the subject property is located within 500 feet of residentially zoned property, with a few low and medium density residential buildings located within this distance along and just east of Gower Street. In general, the project is buffered from the residential uses by existing commercial uses fronting on the east side of Gower Street. The bulk of the surrounding uses are commercial. Moreover, the proposed hotel would be oriented towards El Centro Avenue and designed in a manner that is compatible with surrounding uses. The proposed hotel use would be consistent with ongoing redevelopment efforts in the surrounding area, which has included other hotels, and would help promote and support Hollywood as a tourist destination, consistent with local redevelopment objectives. The proposed hotel's location near existing entertainment and tourism uses would offer convenient accommodations for Southern California visitors.

Finally, the requested zone variance to allow a restaurant with an eating area not on the ground floor would enhance the open space nature of the podium level. In summary, with approval of the requested actions, the project would be in compliance with LAMC requirements. If granted, these approvals will provide the Project Applicant with an opportunity to enhance the project site with a variety of amenities and services that cater to the surrounding community, while providing new job opportunities. The site and surrounding area are located in a portion of the City that is undergoing a significant transition. In particular, many new developments, including other high-density mixed-use projects, are occurring within the surrounding community, revitalizing the Hollywood Center and showing evidence of being a lively, pedestrian-oriented area with a variety of residential, commercial, retail, bar/restaurant and professional office uses, among others. The project would support and promote this transition.

(c) CRA Hollywood Redevelopment Plan

As previously mentioned, the project site is currently designated for Commercial Manufacturing Industrial land uses within the Hollywood Redevelopment Plan. A General Plan Amendment is requested as part of the project, which would change the land use designation to Regional Center. Pursuant to Section 506.2 of the Redevelopment Plan,

Regional Center Commercial land uses shall generally "provide goods and services which are designed in a manner that appeals to a regional market as well as to local markets and includes uses such as theaters, restaurants, hotels, offices, and retail or service businesses." The Regional Center designation is further intended to promote high quality mixed-use developments, including the creation of a "commercial, recreational and residential urban environment with an emphasis on entertainment oriented uses," specifically in areas served by adequate transportation facilities. Residential uses are expressly permitted within the Regional Center designation pursuant to Section 506.3 of the Hollywood Redevelopment Plan. The Redevelopment Plan also specifically seeks to retain businesses, such as entertainment and studio uses, that have traditionally been associated with Hollywood. As the project would provide residential, hotel, office, production studio, restaurant, retail, and other related commercial uses, the proposed uses would be consistent with the Regional Center designation. Furthermore, as discussed above, the project site is adjacent to the Sunset Boulevard transit corridor and near the Hollywood Boulevard transit corridor, both of which are well served by a number of bus lines. Nearby transit hubs include a high capacity Metro Rapid Bus stop and the Hollywood and Vine Red Line Station. Project consistency with applicable goals set forth in the Hollywood Redevelopment Plan is provided in Table IV.F-3 on page IV.F-42.

The project would also require Community Redevelopment Agency Board approval to develop the site at an FAR of up to 5.42:1, as well as Board approval of an Owner Participation Agreement (OPA) to permit development in excess of a 4.5:1 FAR. The Redevelopment Plan aims to achieve an average FAR of 4.5:1 throughout all areas designated for Regional Center uses; however, an FAR of up to 6:1 is permitted by General Plan amendment, provided that certain Redevelopment Plan objectives are met. One of these objectives is that the development must concentrate high-density uses near high capacity transportation facilities, which the project would achieve. In addition, the project would need to meet at least one of the following objectives, all of which it would accomplish: to complement existing architecturally and/or historically significant structures; to create a quality urban environment by providing focal points of entertainment, tourist or pedestrian-oriented uses; to introduce appropriately designed housing; and to provide adequate public open space. The proposed FAR would also require that the following findings be made by the CRA:

1. The proposed development conforms with the provisions and goals of the Redevelopment Plan and any applicable Design(s) for Development or requirements of the Hollywood Boulevard District or Hollywood Core Transition District.

2. Permitting the proposed development serves a public purpose objective such as: the provision of additional open space, cultural facilities, public parking, or the rehabilitation of an architecturally or historically significant building.

Table IV.F-3
Consistency of Project with Applicable Goals
of the Hollywood Redevelopment Plan

Goal	Analysis of Project Consistency
Goal 1: Encourage the involvement and participation of residents, businesspersons, property owners, and community organizations in the redevelopment of the community.	**Consistent.** The project represents a private sector development that seeks to redevelop an underutilized site within Hollywood, while serving the needs of the community and renovating/reusing several existing structures.
Goal 2: Preserve and increase employment, and business and investment opportunities through redevelopment programs and, to the greatest extent feasible, promote these opportunities for minorities and women.	**Consistent.** The project would contribute to the existing diversity of uses in Hollywood by providing residential, hotel, office and community-serving retail and restaurant uses. The commercial uses introduced on-site would generate new jobs available equally to all individuals, while the new residential population would provide an employment population for the surrounding dense urban area. The location of the proposed residential units within close proximity to existing places of employment, services, and other facilities would also be beneficial.
Goal 3: Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.	**Consistent.** As mentioned, the project would contribute to the existing diversity of uses in Hollywood by providing residential, commercial, and entertainment uses, as well as community-serving retail and restaurant uses.
Goal 5: Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as: a) adopting land use standards; b) promoting architectural and urban design standards including: standards for height, building setback, continuity of street facade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances; c) promoting landscape criteria and planting programs to ensure additional green space; d) encouraging maintenance of the built environment; e) promoting sign and billboard standards; f) coordinating the provision of high quality public improvements; g) promoting rehabilitation and restoration guidelines; h) integrate public safety concerns into planning efforts.	**Consistent.** The project site is located within Hollywood, a high-density area featuring a mix of land uses. Development of the mix of uses would expand the land use diversity within the area and serve the needs of existing and future residents. The location of the proposed residential units within close proximity to places of employment, services, and other facilities, as well as being well-served by public transit, would provide opportunities for the use of alternative modes of transportation. The convenient location of such services and proposed mix of uses would promote an improved quality of life by facilitating a reduction in vehicle trips and miles traveled. As discussed throughout this analysis, the project would introduce new development, contemporary architecture, and modern amenities within an older site. Specifically, the project would be designed to provide visual interest through variation in building height, bulk, and massing. The proposed buildings would be treated with contrasting but complementary colors, building plane variations, a variety of building materials, planters and other landscape elements. Multiple surface reliefs and architectural extensions would also be incorporated into the buildings' façades, including the parapets and rooflines. Overall, the project aligns the buildings in a way that permits a variety of long-range views for building occupants. Further, pedestrian links and a mix of landscaped public and private open space, including several large courtyards, would connect and integrate all elements of the project. The project would also involve the renovation and reuse of several existing structures on-site.

Table IV.F-3 (Continued)
Consistency of Proposed Project with Applicable Goals
of the Hollywood Redevelopment Plan

Goal	Analysis of Project Consistency
Goal 6: Support and promote Hollywood as the center of the entertainment industry and a tourist destination through the retention, development and expansion of all sectors of the entertainment industry and the preservation of landmarks related to the entertainment industry.	**Consistent.** The project would involve the renovation and reuse of several existing structures on-site that have historically been associated with the entertainment industry in the area. Moreover, the proposed television studio uses would be consistent with existing development in the surrounding community given the site's location within Hollywood, the historic center of the entertainment industry. The proposed hotel use would further promote the area as a tourist and entertainment destination.
Goal 9: Provide housing choices and increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes; and to provide home ownership opportunities and other housing choices which meet the needs of the resident population.	**Consistent.** The project would provide much needed housing in the Hollywood area, including a mix of residential units varying in size and design. The mix of new various sized units would provide quality housing choices and would increase the overall supply available to meet the needs of the resident population.
Goal 10: Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, traffic and circulation programming, development of open spaces and other support services necessary to enable residents to live and work in Hollywood.	**Consistent.** The project represents an infill development sensitively sited and designed to be compatible with adjacent uses, make use of nearby transit facilities, and provide substantial open space and recreational opportunities. As discussed throughout this analysis, the project would provide a mutually beneficial mix of uses by combining a residential component with community-serving and jobs-generating commercial uses. The project would effectively create a livable neighborhood with complementary uses and pedestrian-oriented amenities.
Goal 11: Recognize, promote and support the retention, restoration and appropriate reuse of existing buildings, groupings of buildings and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria.	**Consistent.** As discussed above, the project would involve the renovation and reuse of several existing structures on-site that have historically been associated with the entertainment industry in the area. The design of the project would respect the scale of the existing structures, located in the southern portion of the site, by concentrating proposed mid- and high-rise development in the central and northern portions of the site, while ensuring the integration of the site through the introduction of pedestrian pathways, courtyards, landscaping, and other pedestrian-oriented amenities.
Goal 12: Support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking and mass transit systems with an emphasis on serving existing facilities and meeting future needs.	**Consistent.** As previously discussed, the project would include substantial open-air and pedestrian amenities. Additionally, the project is well served by existing transit and transportation corridors.
Goal 14: Promote and encourage development of recreational and cultural facilities and open spaces necessary to support attractive residential neighborhoods and commercial centers.	**Consistent.** The project would provide substantial open space, including two public courtyards, a pocket park and two recreation areas for resident/guest use, collectively totaling approximately 76,400 square feet. The open space represents approximately 40 percent of the overall project site area.

Source: Matrix Environmental, 2009.

3. Any adverse environmental effects especially impacts upon the transportation and circulation system of the area caused by proposed development shall be mitigated or are overridden by other social, economic or physical considerations, and statements of findings are made.

The project would also foster community revitalization by renovating several potentially historic buildings and developing an underutilized site with more suitable uses that are compatible with the adjacent commercial and residential neighborhoods. The location of the project would also be advantageous to future residents given the proximity to significant regional employment centers such as Hollywood, Beverly Hills, and downtown Los Angeles via a number of transit options.

As discussed throughout this analysis, the project would be consistent with the overall provisions and goals of the Redevelopment Plan. The project would also provide substantial open space, including two public courtyards, a pocket park and two recreation areas for resident/guest use, collectively totaling approximately 76,400 square feet. This open space represents approximately 40 percent of the overall project site area. Additionally, the project would involve the renovation and re-use of several buildings historically associated with the entertainment industry, which has thrived in the area. While the project would implement mitigation such as restriping, signalization, operational improvements, additional lanes, etc. to address traffic and circulation impacts resulting from the proposed development (refer to Section IV.I, Transportation and Circulation, of this EIR), traffic and circulation impacts would remain significant and unavoidable. Therefore, findings shall be prepared and a statement of overriding considerations shall be adopted pursuant to Finding 3 above. As such, the required findings can be made by the CRA in order to approve an FAR in excess of 4.5:1.

In summary, with approval of the requested discretionary actions, the project would be consistent with the goals and provisions of the Hollywood Redevelopment Plan.

(d) City of Los Angeles State Enterprise Zone (EZ)

The project site is located within the Hollywood region of the City of the Los Angeles State EZ, and thus the project would be eligible for many of the incentives offered by the City. As stated above, the goal of the incentives is to stimulate increased employment opportunities, business attraction, and investment in economically disadvantaged areas. Implementation of the project would help revitalize the project area by creating an economically viable mixed-use development on an underutilized site. Thus, the project would be consistent with the City's intent for the Los Angeles EZ.

(e) Recent City Industrial Policy Initiatives and the Industrial Land Use Policy Project

As previously described, in an effort to protect and strengthen industrial-zoned land, the City developed the Industrial Development Policy Initiative. In addition, the ILUP Memo was prepared by the Planning Department and CRA. The ILUP Memo emphasizes that the City's adopted policy is to retain industrial-zoned land for job-producing uses. The project site is not zoned for industrial uses, and thus, is not included in the Industrial Land Use Survey map for the Hollywood area.

However, the site is designated as Commercial Manufacturing Industrial within the General Plan. With regard to industrial land not surveyed in the Industrial Land Use Survey map, the ILUP Memo provides staff direction to "retain industrial land designation, pursuant to adopted City policy". The existing buildings of the Columbia Square Complex are occupied by television studio and related office uses. Nonetheless, the ILUP Memo states that approval for a change of use or zone for industrial land not studied may be appropriate if the project incorporates Community Benefits to ensure compatibility and to compensate for the permanent loss of employment land. Community benefits suggested for staff consideration include aspects such as relocation consultation for displaced businesses, a job training assistance fund, a minimum jobs-producing space, affordable housing, open space, and infrastructure improvements. The project would provide many of the community benefits identified within the ILUP Memo. Specifically, the project's 125-room hotel, approximately 380,000 square feet of office space, and approximately 41,300 square feet of retail space and restaurant/bar uses (including restaurant/bar uses in the hotel) would create a number of jobs in the Hollywood area. The office space, in particular, would provide a greater number of professional employment opportunities than what currently exists on-site. In addition, the project would provide needed housing for varying income levels as well as substantial open space that would include landscaped courtyards and pathways. Furthermore, the project would provide infrastructure improvements to serve the needs of project residents, visitors, and employees. It should also be noted that the development of more intensive industrial uses on the project site would likely create land use compatibility issues with regard to the surrounding residential and commercial uses. Furthermore, the project's proposal to change the site's Commercial Manufacturing Industrial designation to Regional Commercial uses would be consistent with the existing C4 zoning. Therefore, considering the number of community benefits that the project would provide, the project would be consistent with the intent of the City's Industrial Policy Initiatives and ILUP.

(2) Consistency with Regional Plans and Applicable Policies

(a) Southern California Association of Governments (SCAG) Regional Comprehensive Plan and Guide (RCPG), Regional Transportation Plan (RTP), and Growth Vision Report

Policies within SCAG's RCPG, adopted in 1996, that are related to land use are generally contained within Chapter 3, Growth Management. Table IV.F-4 on page IV.F-47 provides an analysis of project consistency with applicable RCPG policies. Table IV.F-4 also includes an analysis of the project's consistency with the applicable goals/polices in SCAG's 2004 Regional Transportation Plan and the Growth Vision Report, which was developed through the Southern California Compass process. As demonstrated therein, the project would be substantially consistent with the goals/policies set forth in each of these SCAG documents.

(b) Southern California Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP) and Metro Congestion Management Plan (CMP)

The air quality impacts associated with the project relative to the Air Quality Management Plan are evaluated in Section IV.B, Air Quality, of this EIR. As discussed therein, the project would be consistent with the AQMP. In addition, as discussed in Section IV.I, Transportation and Circulation, of this EIR, implementation of the project would not conflict with the CMP as it would not exceed CMP thresholds at any CMP intersection or freeway monitoring location.

(c) Conclusion Regarding Impacts on Regulatory Framework

Based on the above analysis and with approval of the requested General Plan Amendment, Zone Change, Conditional Use Permit, and Site Plan Review findings, implementation of the project would be generally consistent with applicable land use polices and the land use designations and zoning for the project site. Therefore, significant impacts associated with the project's consistency with applicable land use plans would not occur, and no mitigation measures would be required.

(3) Land Use Compatibility

Land use compatibility addresses whether the project would be compatible in terms of use, size, intensity, density, and scale with surrounding uses. Hollywood is a developed urban community characterized by a mix of office, retail, hotel, restaurant, entertainment, and residential uses within low- to high-rise settings. The project would contribute to the existing diversity of uses in Hollywood by providing residential units and community-serving commercial uses within a mixed commercial and residential area, located adjacent to a major commercial corridor.

Table IV.F-4
Project Consistency with Applicable SCAG Policies and Recommendations

[a]	Policy/Recommendation	Project Consistency Analysis
Regional Comprehensive Plan and Guide (RCPG) Policies		
Growth Management Chapter		
3.01	The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.	**Consistent.** SCAG regional growth forecasts regarding population, housing, and jobs as adopted by the Regional Council have been utilized, where relevant, within this EIR. As such, this project would be consistent with this RCPG policy.
3.03	The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.	**Consistent.** The project site is located in an urban area already served by existing infrastructure and an established transportation system. The project would provide new connections to existing utility systems and would include on-site fire prevention and safety measures to reduce demand for fire and police services. Furthermore, on-site amenities, such as active and passive recreation opportunities, including two public courtyards and a pocket park, would be provided. Therefore, the project would not conflict with this RCPG policy.
3.04	Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.	**Consistent.** As indicated in Section II, Project Description, the project would provide 400 multi-family residential units consisting of varying sizes and designs to help meet the housing demand in Los Angeles. The proposed mix of uses would also generate jobs, thus providing a balance of jobs and housing, and would cluster development to create an activity center and provide for the efficient provision of infrastructure. By locating residential units and hotel uses in close proximity to jobs, transit, office space, shops and restaurants, the project would enhance the quality of life for residents, workers and visitors to the area. As such, the project would not conflict with this RCPG policy.
3.05	Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.	**Consistent.** The project is located in the highly urbanized Hollywood area, which is served by existing infrastructure. As mentioned above, the project would concentrate development to create an activity center and provide for the efficient provision of infrastructure, thus minimizing infrastructure costs. Therefore, the project would be consistent with this RCPG policy.
3.08	Encourage subregions to define an economic strategy to maintain the economic vitality of the subregion including the development and use of marketing programs, and other economic incentives, which support attainment of subregional goals and policies.	**Consistent.** The project would revitalize an existing underutilized site through the development of needed housing and community-serving commercial uses, thereby improving the community's tax base and contributing to the economic vitality of the Hollywood area. Furthermore, as the site is located within a State Enterprise Zone, the project would support the City's goals of business attraction, growth, and increased employment opportunities for this area. As such, the project would be consistent with this RCPG policy.

Table IV.F-4 (Continued)
Project Consistency with Applicable SCAG Policies

[a]	Policy/Recommendation	Project Consistency Analysis
3.09	Support local jurisdictions' efforts to minimize cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.	**Consistent.** As discussed above, the project is located in an urbanized area served by local utilities, public services, and transportation systems. The project would require new connections to existing infrastructure but would not require the installation of new systems. Additionally, the project would maintain and expand property, retail, and other City tax revenues that may be used to support local infrastructure improvements. Thus, the project would be consistent with this RCPG policy.
3.11	Support provisions and incentives created by local jurisdictions to attract housing growth in job rich subregions and job growth in housing rich subregions.	Consistent. The project is located within a major entertainment and economic area. Specifically, based on the 2000 Census data, there were approximately 101,291 people employed in the Hollywood Community Plan area. However, there were only approximately 99,939 dwelling units.[18] By developing new residential uses in conjunction with jobs-generating commercial uses, the project would help meet the housing needs of this area and would improve the job/housing balance. Therefore, the project would be consistent with this RCPG policy.
3.12	Encourage existing or proposed local jurisdictions programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.	**Consistent.** The project area is well served by public transit provided by Metro and LADOT, and nearby transit hubs include a high capacity Metro Rapid Bus stop and the Hollywood and Vine Red Line Station. By developing residential uses near transit facilities, the project would encourage the use of alternative transportation. The proposed mix of uses would also allow people to accomplish multiple activities in the area, thereby reducing vehicle trips and vehicle miles traveled. In addition, the project would enhance pedestrian activity and street life in the area. Therefore, the project would be consistent with this RCPG policy.
3.13	Encourage local jurisdiction's plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.	**Consistent.** The project is an infill development within an existing urbanized area and would encourage increased use of public transit given its location on a major transit corridor (Sunset Boulevard). The project would be consistent with this RCPG policy.
3.14	Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems and activity centers	**Consistent.** As discussed, the project site is located near several major transit facilities within the highly urbanized Hollywood area, a center of economic activity. The project would cluster development to create an activity center with increased density on-site. As such, the project would be consistent with this RCPG policy.

[18] *City of Los Angeles 2000 Census Statistical Profile for the Hollywood Community Plan area, http://cityplanning.lacity.org/DRU/HomeC2K.cfm; accessed February 25, 2009.*

Table IV.F-4 (Continued)
Project Consistency with Applicable SCAG Policies

[a]	Policy/Recommendation	Project Consistency Analysis
3.15	Support local jurisdictions strategies to establish mixed-use clusters and other transit oriented developments around transit stations and along transit corridors.	**Consistent.** The project is a high density, mixed-use development that would be located in proximity to public transit facilities, as discussed above. As such, the project would be consistent with this RCPG policy.
3.16	Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.	**Consistent.** The project would be located along Sunset Boulevard, a Major Highway Class II, and would be well served by a number of transit services provided by Metro and LADOT. The project would also redevelop an underutilized site within the Hollywood Community, a regional center of economic and entertainment activity. In addition, the project would be served by existing infrastructure. As such, the project would be consistent with this RCPG policy.
3.17	Support and encourage settlement patterns which contain a range of urban densities.	**Consistent.** The project would introduce new residential densities within the area, which would be compatible with surrounding residential and commercial uses. The project would also introduce retail and restaurant uses that would be complementary to both the adjacent commercial development and the surrounding residential uses. As such, the project would be consistent with this RCPG policy.
3.18	Encourage planned development in locations least likely to cause environmental impact.	**Consistent.** The project would result in the redevelopment of a site located in an urbanized area with existing residential, retail, and other commercial uses. Development of the project would be compatible with and support existing and future land uses. Furthermore, the project would be served by existing infrastructure within the area and would reduce vehicle trips by placing residential uses in close proximity to public transit facilities. Overall, the urbanized location of the project would minimize the potential for environmental impacts. Therefore, the project would be consistent with this RCPG policy.
3.21	Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.	**Consistent.** As analyzed in the Initial Study, provided in Appendix A of this EIR, there are no recorded archaeological resources located within the project site. If, however, a unique archaeological resource were discovered during construction of the project, work in the area would cease and deposits would be treated in accordance with Federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Additionally, the project would involve the renovation and re-use of several historic buildings associated with the entertainment industry, which has thrived in the area. As a result, the project would encourage the preservation and protection of recorded and unrecorded cultural resources. As such, the project would be consistent with this RCPG policy.

Table IV.F-4 (Continued)
Project Consistency with Applicable SCAG Policies

[a]	Policy/Recommendation	Project Consistency Analysis
3.22	Discourage development or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.	**Consistent.** The site topography is generally flat, and no steep slopes are present on the site or in the immediate area. Furthermore, the site is currently fully developed and located within the highly urbanized community of the Hollywood. No wildland areas that could pose a high fire risk, nor surface water bodies which could cause flooding, are present in the area. The project, however, is located within the seismically active region of Southern California. As such, the project would be subject to special design requirements, specifically those set forth in the Uniform Building Code, LAMC, and recommendations set forth in the Geotechnical Report. As such, the project would be consistent with this RCPG policy.
3.23	Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measure that would reduce exposure to seismic hazards, minimize earthquake damage and to develop emergency response and recovery plans.	**Consistent.** As discussed in Section IV.G, Noise, of this EIR, mitigation measures shall be implemented to minimize construction-related noise levels. As discussed in the Initial Study in Appendix A, no biological species identified as a , sensitive or special status species occur on the project site. In addition, the project would be required to comply with all applicable City building standards and regulations with regard to seismic safety to minimize exposure to seismic hazards. The project would also maintain adequate access for fire and emergency vehicles as required by the LAFD. Therefore, operation of the project would not impair implementation or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project would be consistent with this RCPG policy.
3.24	Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.	**Generally Consistent.** As previously discussed, the project would provide 400 multi-family residential units consisting of varying sizes and designs to help meet the housing demand in Los Angeles.
3.27	Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as public education, housing, health care, child care, social services, recreational facilities, law enforcement, and fire protection.	**Consistent.** The project would provide housing in an area well served by necessary infrastructure. With development of the project, economic opportunities would increase during construction and operations. In addition, the project would revitalize an underutilized site through the development of new residential and commercial uses, thereby improving the community's tax base and bringing stability to the area. An increased tax base would allow greater provision of public services for all members of society. Furthermore, on-site amenities, such as active and passive recreation opportunities, would be provided for project residents as well as the public. The project would thus be consistent with this RCPG policy.

Table IV.F-4 (Continued)
Project Consistency with Applicable SCAG Policies

[a]	Policy/Recommendation	Project Consistency Analysis
Regional Mobility Chapter Subgoals		
	Foster Economic Vitality through promoting transportation strategies that support and encourage economic vitality within the region, and assist in developing the Southern California economic base.	**Consistent.** The proposed mixed-use project would address the shortage of housing opportunities in the area and would foster a pedestrian-friendly community by providing community-serving retail within the highly active Hollywood Community Plan Area.[19] It would also incorporate an urban design that would contribute to the vitality of Hollywood. As such, the project would be consistent with this RCPG policy.
	Foster Economic Vitality by promoting transportation strategies that reduce public and private costs, and enhance the region's competitive position.	**Consistent.** The proposed mix of residential and commercial uses, combined with publicly accessible open space resources such as landscaped courtyards and a garden, would foster a pedestrian-friendly community. This infill development would also make use of its location near substantial existing infrastructure and transit facilities. The project would thus enhance Hollywood's competitive position as a premier "live, work, play" destination. As such, the project would be consistent with this RCPG policy.
	Enhance the Environment by supporting transportation strategies that minimize impacts on the environment.	**Consistent.** As discussed under RCPG Policy 3.18, the urbanized location of the project would minimize the potential for environmental impacts. The project would also provide a synergistic mix of uses on-site with substantial pedestrian amenities, located near existing transit facilities, thereby reducing vehicle trips and vehicle miles traveled. As such, the project would be consistent with this RCPG policy.
	Enhance the Environment by supporting transportation policies and actions to meet state and federal air quality goals and objectives.	**Consistent.** The project would develop new residential and commercial uses in proximity to existing public transportation facilities. These combined uses would result in a reduction in vehicle miles traveled and associated air quality emissions. As such, the project would be consistent with this RCPG policy.
	Reduce Energy Consumption by supporting transportation strategies and investments that decrease the region's dependence on traditional fossil fuels.	**Consistent.** The project would foster a pedestrian-oriented community environment and would be located near several transit facilities, thereby supporting transportation strategies and investments that decrease the region's dependence on traditional fossil fuels. As such, the project would be consistent with this policy.

[19] *According to the City of Los Angeles General Plan Housing Element, growth estimates have led to a Regional Housing Needs Assessment (RHNA) allocation for the City of 112,876 new housing units that will be needed during the planning period of 2006-2014 (page 10).*

Table IV.F-4 (Continued)
Project Consistency with Applicable SCAG Policies

[a]	Policy/Recommendation	Project Consistency Analysis
	Reduce Energy Consumption by encouraging non-motorized trips.	**Consistent.** The project would comply with State and local energy efficiency standards. In addition, the project would allow for increased residential density within an activity center that would foster the growth of a pedestrian-oriented community, thereby encouraging non-motorized trips. As such, the project would be consistent with this RCPG policy.
	Promoting Transportation-Friendly Development by encouraging land use development patterns that complement transportation investments.	**Consistent.** The project would redevelop and increase the density of an urbanized site located within an existing activity center near numerous transit systems. As such, the project would be consistent with this RCPG policy.
	Promoting Transportation-Friendly Development by fostering land use decision that encourage alternatives to the auto.	**Consistent.** As discussed throughout this analysis, the project would encourage alternative transportation by locating new residential and commercial uses along a major transit corridor (Sunset Boulevard) within an activity center. The project would foster a pedestrian-oriented environment with a mix of synergistic uses, thereby reducing vehicle trips. As such, the project would be consistent with this RCPG policy.
Housing Chapter Recommendations		
	Providing an adequate supply and availability of housing by reducing major components of new housing costs.	**Consistent.** The residential component of the project would include 400 multi-family residential units. The infill nature of the project, the density of the proposed housing, and available infrastructure all support consistency with this RCPG policy.
	Promoting a mix of housing opportunities region wide through social equality and equal housing opportunities.	**Consistent.** The project's 400 multi-family residential units would include a mix of unit types that would be available to all members of society. Thus, the project would be consistent with this RCPG policy.
Open Space and Conservation Chapter Recommendations		
	Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.	**Consistent.** As discussed in Section IV.H.4, Parks and Recreation, the project would provide 76,400 square feet of private and common open space on-site, including two public courtyards and a pocket park, as well as two recreation areas for project resident/guest use with swimming pools, entertaining patios, and sunning areas. The proposed open space represents approximately 40 percent of the overall project site area. The project would also include a mitigation measure requiring the provision of adequate park space, payment of in-lieu fees, or provision of on-site improvements equivalent in value to the in-lieu fees. With incorporation of this mitigation measure, the project would either provide or help fund adequate land resources to meet the outdoor recreational needs of the present and future residents in the region, and subsequently the promotion of tourism in the region. Therefore, the project would not conflict with this RCPG policy. Please refer to Section IV.H.4, Parks and Recreation, for further discussion of recreation.

Table IV.F-4 (Continued)
Project Consistency with Applicable SCAG Policies

[a]	Policy/Recommendation	Project Consistency Analysis
	Increase the accessibility to open space lands for outdoor recreation.	**Consistent.** Please refer to the analysis provided above regarding Policy 9.01.
	Promote self-sustaining regional recreation resources and facilities.	**Consistent.** As discussed above, the project would provide recreational facilities for on-site residents and/or guests consisting of two recreation areas with swimming pools, entertaining patios, and sunning areas, along with publicly accessible open space and pedestrian amenities. As such, the project would be consistent with this RCPG policy. Please refer to Section IV.H.4, Parks and Recreation, for further discussion of recreation.
	Maintain open space for adequate protection to lives and properties against natural and manmade hazards.	**Consistent.** The proposed project would provide approximately 76,400 square feet of private and common open space. As analyzed in the Initial Study provided in Appendix A of this EIR, the project site is not located in an area where high geological hazards exist (i.e., landslides, wildland fire, unstable soils, liquefaction). While manmade hazards would not be expected relative to the proposed uses, historical use of the site has involved the use of asbestos-containing materials, lead-based paint, and a diesel underground storage tank. As analyzed in Section IV.D, Hazards and Hazardous Materials, with incorporation of mitigation measures, potential impacts relative to associated hazards would be less than significant. As such, the project would be consistent with this RCPG policy. Please refer to Section IV.D, Hazards, for further discussion.
	Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipments.	**Consistent.** As previously discussed, the site is characterized by a relatively flat topography and is not located within any hillsides or canyon areas. Furthermore, the site's location within a highly urbanized area and the distance from surface water bodies preclude the site from being susceptible to flooding and wildfire hazards. The project is located within the seismically active region of Southern California and would be susceptible to seismic ground shaking during an earthquake. However, the project would adhere to current engineering standards, the seismic safety requirements set forth in the City's Building Code LAMC, and design recommendations set forth in the Geotechnical Report. Thus, impacts related to seismic hazards would be less than significant. With regard to emergency access, the project site would be accessible to emergency vehicles from Sunset Boulevard and the various driveways on-site. As such, the project would be consistent with this RCPG policy.

Table IV.F-4 (Continued)
Project Consistency with Applicable SCAG Policies

[a]	Policy/Recommendation	Project Consistency Analysis
	Minimize public expenditure for infrastructure and facilities to support urban type uses in areas where public health and safety could not be guaranteed.	**Consistent.** The project would redevelop an existing site that is already served by existing infrastructure and facilities. Furthermore, the project site is located within the highly urbanized Hollywood Community, where public health and safety facilities are available (e.g., Hollywood Community Hospital, Los Angeles Fire Department Fire Station No. 27, Hollywood Community Police Station). As such, the project would be consistent with this RCPG policy.
Water Quality Chapter		
11.02	Encourage "watershed management" programs and strategies, recognizing the primary role of local governments in such efforts.	**Consistent.** The project site is located in the Ballona Creek Watershed. As analyzed in Section IV.E, Hydrology and Water Quality, the project would decrease the amount of impervious area on the site through the introduction of new landscaped areas. Furthermore, the project would not increase storm water runoff during a 10-year or 50-year storm relative to existing conditions. Therefore, the project would not have a negative effect on the existing watershed and would not conflict with watershed management programs and strategies. As such, the project would be consistent with this RCPG policy.
Regional Transportation Plan (RTP) Policies		
	Transportation investments shall be based on SCAG's adopted Regional Performance Indicators.	**Consistent.** As the project would not be responsible for monitoring or measuring the performance of regional transportation, this policy is not directly applicable to the project. However, the policy is intended to encourage land use and transportation planning in a manner that would cause favorable outcomes for the performance indicators. The project's development characteristics are consistent with design principles that are considered to make positive contributions to the performance of the transportation system. For example, the project would provide housing units in a jobs-rich metropolitan area, providing workers the opportunity to live closer to their work place and avoid long commutes that adversely affect the performance indicators. Further, the project would be constructed in an area served by existing transportation infrastructure maintained and operated by the City. As discussed throughout this analysis, the project would support the use of alternative transportation modes such as transit and walking. To the extent that these modes are employed by project residents and visitors, the measured performance indicators would be improved. Therefore, the project would be consistent with this RTP policy.

Table IV.F-4 (Continued)
Project Consistency with Applicable SCAG Policies

[a]	Policy/Recommendation	Project Consistency Analysis
	Ensuring safety, adequate maintenance, and efficiency of operations on the existing multi-modal transportation system will be RTP priorities and will be balanced against the need for system expansion investments.	**Consistent.** As analyzed in Section IV.I, Transportation and Circulation, the project would add an estimated 191 new transit riders in both the A.M. peak and P.M. peak hours to the existing transit systems in the area. The introduction of new transit riders would not exceed the capacity of the available alternative transportation facilities, given the available transit capacity in the project area. As such, the project would not significantly impact public transit such that system expansion would be necessary. Therefore, the project would be consistent with this RTP policy.
	RTP land uses and growth strategies that differ from currently expected trends will require a collaborative implementation program that identifies required actions and policies by all affected agencies and sub regions.	**Consistent.** The project supports growth as anticipated in the SCAG forecasts. No actions are required to address variations from the RTP strategies. Therefore, the project would be consistent with this policy.
	Growth Vision Report	
	Principle 1: Improve mobility for all residents • Encourage transportation investments and land use decisions that are mutually supportive. • Locate new housing near existing jobs and new jobs near existing housing. • Encourage transit-oriented development. • Promote a variety of travel choices.	**Consistent.** The project is an infill development within an existing, high-density urban area. The project would provide 400 housing units in a jobs-rich area, while also providing additional employment opportunities. The project would be located adjacent to or within a short walk to several alternative transportation facilities, which collectively provide regional service. Therefore, the project would be consistent with this Growth Vision principle.
	Principle 2: Foster livability in all communities • Promote infill development and redevelopment to revitalize existing communities. • Promote developments, which provide a mix of uses. • Promote "people scaled," walkable communities. • Support the preservation of stable, single-family neighborhoods.	**Consistent.** The project would provide an infill development and contribute to the City's housing stock. It would generate pedestrian activity since a variety of retail, restaurant, and office uses would be provided in conjunction with pedestrian amenities on-site. Project development would not require alterations to existing stable residential neighborhoods and would provide an alternative living choice outside of existing residential neighborhoods. Therefore, the project would be consistent with this Growth Vision principle.

Table IV.F-4 (Continued)
Project Consistency with Applicable SCAG Policies

[a]	Policy/Recommendation	Project Consistency Analysis
	Principle 3: Enable prosperity for all people • Provide, in each community, a variety of housing types to meet the housing needs of all income levels. • Support educational opportunities that promote balanced growth. • Ensure environmental justice regardless of race, ethnicity or income class. • Support local and state fiscal policies that encourage balanced growth. • Encourage civic engagement.	**Consistent.** Many of the "Principle 3" items apply to civic responsibilities that are beyond the scope of an individual project. However, it is noted that the proposed housing units would include a variety of unit sizes and contribute to the range of housing opportunities within the City and subregion. The project would also promote balanced growth through the provision of both new jobs and housing. Therefore, the proposed project would be consistent with this Growth Vision principle.
	Principle 4: Promote sustainability for future generations • Preserve rural, agricultural, recreational and environmentally sensitive areas. • Focus development in urban centers and existing cities. • Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste. • Utilize "green" development techniques.	**Consistent.** The project would not cause development within any rural, recreational or environmentally sensitive area. Rather, the project would develop an underutilized site within an urbanized area and would tie into existing infrastructure systems. As previously discussed, the proposed mix of uses and associated open amenities would create a pedestrian-friendly environment, promote the use of transit, and reduce auto trips and vehicle miles traveled. The project would be designed to achieve the LEED Silver rating and thus, would also exceed the requirements of Title 24 of the California Energy Code by 14 percent and would thereby support conservation and reduce pollution. Therefore, the project would be consistent with this Growth Vision principle.

[a] *SCAG policies relevant to the project were identified and numbered by SCAG in a May 24, 2007 letter to the City Planning Department (Please see Appendix A – Initial Study/NOP/NOP Comment Letters for a copy of this letter)*

Source: Matrix Environmental, 2009.

As discussed early in this section, the properties surrounding the project site encompass a variety of uses, including office buildings, retail and restaurant/bar uses, entertainment uses such as nightclubs and cinemas, television production facilities, car washes, fitness facilities, a bank, a hospital, surface and structured parking, and apartment buildings as well as single-family homes. These uses were developed over a span of several decades and feature a variety of building types and architectural styles. The eclectic nature of these uses and their associated architecture results in a non-cohesive visual character within the area. Additionally, many of the properties in the area are underutilized, as evidenced by the plethora of surface parking lots. Further, with the

exception of some of the newer mixed use, restaurant, and retail uses nearby, much of the existing development in the area is sparsely landscaped, and the project area lacks pedestrian amenities. Nonetheless, the project vicinity is undergoing a significant transition as population increases are expected and new development, including mixed-use development, is ongoing.

The land uses proposed as part of the project would serve the surrounding employment base and residential neighborhoods and would contribute to the vitality of the area. In particular, the project would provide community-serving retail, restaurant, and office uses while introducing new housing within the Hollywood area. Moreover, as discussed previously, the proposed residential uses in proximity to commercial uses would both promote the job/housing balance and serve to retain commercial, and specifically entertainment-related employment. The project's commercial component would be compatible with existing commercial uses along Sunset Boulevard, while the proposed residential uses would be consistent with the multi-family residential uses immediately east of the site. The project would also foster community revitalization by renovating existing historic buildings on the site and developing an underutilized site with more suitable uses that are compatible with the adjacent commercial and residential neighborhoods. A discussion of the compatibility of specific project components (e.g., the hotel, television studio uses, and alcohol service) that are permitted by conditional use permit with surrounding land uses is provided below.

Relative to the location of the proposed hotel use in proximity to residentially zoned properties, only a few low and medium density residential buildings are located within 500 feet of the site, to the east of Gower Street. The project would be buffered from these off-site residential uses by existing commercial uses fronting the east side of Gower. Moreover, the hotel would be oriented towards El Centro Avenue (i.e., to the west) and surrounded by compatible commercial uses and parking areas located off-site. The proposed hotel would be consistent with redevelopment efforts ongoing in the surrounding area, including other hotel development, intended to retain and promote Hollywood as a tourist destination. In the immediate vicinity of the proposed hotel are several facilities that attract substantial tourist traffic such as the Hollywood Palladium event venue, Arclight Cinemas at the Cinerama Dome, Aquarius Theater/Nickelodeon Studios, and the Hollywood Walk of Fame, all of which strengthen the area as a magnet for foot traffic and tourism. The proposed hotel would be situated sufficiently close to the entertainment and tourism industries in Hollywood to offer convenient housing for Southern California visitors.

The proposed studio uses would also be proper in relation to surrounding development given their location within Hollywood, the historic center of the entertainment industry. Nearby off-site uses include Sunset/Gower Studios across Sunset Boulevard to the southeast, Raleigh Studios on Melrose Avenue to the south, and Paramount Studios also on Melrose. Moreover, the project site is currently developed with studio uses.

Additionally, supporting uses for film and television studios, such as post-production facilities and wardrobe services, are located throughout the area. Maintaining the ability to use the project site for studios would support the other studio uses in the area and be consistent with local agency goals for the area.

As discussed above, the Project Applicant seeks a blanket conditional use permit to permit the on-site sale and on- and off-site consumption of a full line of alcoholic beverages at up to nine venues (e.g., sit-down restaurants, lounges, catering establishments). The blanket conditional use approval would also require that each operator seek and obtain plan approval from the Zoning Administrator before being authorized to serve alcohol within the project. The purpose of the plan approval is to ensure that each operator proposes a use that would be consistent and compatible with the blanket conditional use. The Project Applicant also seeks an entertainment-related conditional use permit to allow live entertainment/dancing at three venues: the hotel lounge, special events in and around the outdoor plaza on Gower Street, and special events in a proposed banquet hall/event space within the site. As Hollywood has long functioned as an entertainment destination with many theaters, restaurants, and nightclubs in the local area, the proposed uses ultimately approved for alcohol sales and consumption and/or live entertainment would not be out of place with the surrounding uses. A key element of any fine dining restaurant, bar, lounge, hotel, or catering service is the ability to serve a full line of top-quality alcoholic beverages. The screening process will include careful consideration of the location of these venues in relation to likely adjacent and nearby establishments, as well as the uses and character of the adjacent community. Further, several restaurant/bar and entertainment uses with permits to serve alcohol and/or allow live entertainment/dancing are located near the project site. The project would thus be proper in relation to these adjacent uses and the continued development of the Hollywood Community by providing a full range dining and entertainment options to local residents and visitors alike.

The project incorporates a site design such that the parking structure would not be visible from public rights-of-way, with the exception of the vehicular driveways along El Centro Avenue, Selma Avenue and Gower Street. Parking would be provided within a multi-level parking structure consisting of nine levels, including three subterranean levels, which would be located within the central portion of the site and completely surrounded by buildings and structures. The parking uses would thus be embedded within the site interior and hidden from view.

In addition, as previously described, the project would include landscape plans intended to encourage pedestrian activity and improve the quality of life for residents, employees, shoppers, and visitors. The project would provide two landscaped courtyards and a pocket park that would be open to the general public. In particular, the existing plaza fronting Sunset Boulevard that is a part of the Columbia Square Complex would be renovated and reintroduced as a new pedestrian-oriented amenity for the greater

community. This new plaza would connect to other green spaces on-site and create a walkable district, enabling nearby residents and visitors to walk through and enjoy a vast majority of the project site. In addition, landscaping, including several ornamental trees, would be provided along the site perimeter, as well along pedestrian walkways throughout the project. Such improvements would create a pedestrian-friendly environment that would enhance the visual character of the site and surrounding streetscape and promote compatibility with adjacent uses.

Relative to the project's layout, design, and architecture, the heights of the proposed buildings would range from approximately 75 feet to approximately 512 feet (including helipads, rooftop equipment, and architectural features). The project design reflects a transition in building height with regard to the neighborhood's character. The transitional heights of the project would maintain the existing low-rise buildings in the southern portion of the site, permit mid- to high-rise buildings throughout the central and northern portions of the site, and concentrate the tallest component of the project in the northwest corner of the site, furthest from Sunset Boulevard and existing off-site residential uses to the east. This vertical vernacular would provide a transition between the surrounding commercial and more distant residential uses while allowing for a higher density development within the site. The project would also be designed to provide substantial and striking visual interests since all of the buildings vary in height, bulk and massing, thus creating an identity that is distinctive yet compatible with surrounding uses.

As discussed in further detail in Section IV.A, Aesthetics, of this EIR, the design of the proposed improvements would improve and enhance the visual character of the site, be aesthetically compatible with surrounding uses, and generally improve the identity of the site and the Sunset Boulevard commercial corridor. The project would incorporate design elements with an architectural theme that complements the existing character of the area. Additionally, the project would incorporate attractive lighting, for purposes of providing security and aesthetic enhancements, while also being sensitive to nearby properties. Moreover, the project would be designed to be non-intrusive on adjacent uses with enclosed loading facilities, interior trash collection, and hidden interior parking. As demonstrated throughout this analysis, the project would not disrupt, divide, or isolate any existing neighborhoods or communities.

Since construction activities can also be a source of compatibility issues, construction is also addressed herein. Construction of the project would result in temporary significant impacts associated with air quality and noise. However, these impacts would be short-term in nature and would be staged to minimize disruption to neighboring streets and properties. Please refer to Section IV.B, Air Quality, and Section IV.G, Noise, of this EIR for further discussion.

Based on the above, the project would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term effect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation. Project impacts related to land use compatibility would be less than significant.

4. Cumulative Impacts

As indicated in Section III of this EIR, there are 94 related projects in the project vicinity. The related projects generally consist of infill development and redevelopment of existing uses, including substantial mixed-use and residential development. As with the project, the related projects would be required to comply with relevant land use policies and regulations. Therefore, as the project would generally be consistent with applicable land use plans, the project would not incrementally contribute to cumulative inconsistencies with respect to land use plans. Cumulative impacts on the regulatory framework would be less than significant.

There are numerous related projects located within a few blocks of the project site. These proposed developments comprise a variety of uses, including apartments, condominiums, office buildings, hotels, restaurants/cocktail lounges, and retail uses, as well as mixed-use developments incorporating some or all of these elements. As discussed previously, the project vicinity is undergoing a significant transition as the City's residential population continues to increase. Major developments are underway, effecting a widespread revitalization of the area and renovation of older structures, and much needed housing is being introduced. Further, with the renaissance of the Hollywood business district, the area is attracting more visitors, thus requiring adequate new amenities. The project would be compatible with the various developments planned throughout the surrounding vicinity, as well as with existing uses in the immediate area. While the project in combination with the related projects represents a continuing trend of infill development at increased densities, they also will serve to modernize the area and provide sufficient infrastructure and amenities to serve the growing population. Such related projects are not expected to fundamentally alter the existing land use relationships in the community, but rather would concentrate development on particular sites and promote a synergy between existing and new uses. As such, the project would not contribute to a cumulative impact with respect to land use compatibility.

5. Mitigation Measures

Based on the above analysis, with incorporation of the project design features and passage of the proposed discretionary permits and requests, the project would generally be consistent with existing regulatory requirements and relevant land use policies. In addition,

the project would not disrupt or divide an established community. Thus, no mitigation measures would be required.

6. Level of Significance After Mitigation

Impacts related to land use would be less than significant, and therefore, no mitigation measures would be required.

IV. Environmental Impact Analysis

G. Noise

1. Introduction

This section analyzes the potential noise and vibration impacts that would result from the project. The analysis describes the existing noise environment within the project area, estimates future noise and vibration levels at surrounding land uses resulting from construction and operation of the project, identifies the potential for significant impacts, and provides mitigation measures to address significant impacts. In addition, an evaluation of the potential cumulative noise impacts of the project and related projects is also provided. Noise calculation worksheets are included in Appendix F of this EIR.

2. Environmental Setting

a. Noise and Vibration Basics

(1) Noise

Noise is usually defined as sound that is undesirable because it interferes with speech/ communication and hearing, or is otherwise annoying (unwanted sound). The decibel (dB) is a conventional unit for measuring the amplitude of sound because it accounts for the large variations in sound pressure amplitude and reflects the way people perceive changes in sound amplitude.[1] The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this human frequency-dependent response, the A-weighted system is used to adjust measured sound levels (dBA). The term "A-weighted" refers to a filtering of the noise signal in a manner corresponding to the way the human ear perceives sound.

People judge the relative magnitude of sound sensation by subjective terms such as "loudness" or "noisiness". A change in sound level of 3 dB is considered "just perceptible," a change in sound level of 5 dB is considered "clearly noticeable, and a change of 10 dB is recognized as "twice as loud".[2]

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[1] *All sound levels, measured in decibel (dB), in this study are relative to $2x10^{-5}$ N/m^2.*

[2] *Engineering Noise Control, Bies & Hansen, 1988.*

Community noise levels usually change continuously during the day. The equivalent sound level (L_{eq}) is normally used to describe community noise. The L_{eq} is the equivalent steady-state A-weighted sound level that would contain the same acoustical energy as the time-varying A-weighted sound level during the same time interval. For intermittent noise sources, the maximum noise level (L_{max}) is normally used to represent the maximum noise level measured during the measurement.

To assess noise levels over a given 24-hour time period, the Community Noise Equivalent Level (CNEL) descriptor is used. CNEL is the time average of all A-weighted sound levels for a 24-hour period with a 10 dBA adjustment (upward) added to the sound levels which occur in the night (10 P.M. to 7 A.M.) and a 5 dBA adjustment (upward) added to the sound levels which occur in the evening (7 P.M. to 10 P.M.). These penalties attempt to account for increased human sensitivity to noise during the quieter nighttime periods, particularly where sleep is the most probable activity. CNEL has been adopted by the State of California to define the community noise environment for development of the community noise element of a General Plan and is also used by the City of Los Angeles for land use planning and to describe noise impacts in its *City of L.A. CEQA Thresholds Guide (2006)*.[3]

(2) Ground-Borne Vibration

Ground-borne vibration is motion from waves traveling through the ground or other solid media. This oscillatory motion can be measured in terms of displacement, velocity, or acceleration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration amplitudes. PPV is defined as the maximum instantaneous peak of the vibration signal, while RMS is defined as the square root of the average of the squared amplitude of the signal. PPV is typically used for evaluating potential building damage, whereas RMS is typically more suitable for evaluating human response. Vibration levels described in this section are in the unit of inch-per-second. Typically, ground-borne vibration generated by man-made activities decreases rapidly with distance from the source of the vibration. Man-made vibration issues are therefore usually confined to short distances (approximately 100 feet or less) from the source.

b. Regulatory Framework

Many government agencies have established noise standards and guidelines to protect citizens from potential hearing damage and various other adverse physiological and social effects associated with noise and ground-borne vibration. The City of Los Angeles has adopted a number of policies, which are based in part on federal and State regulations and

[3] *State of California, General Plan Guidelines, 2002.*

are directed at controlling or mitigating environmental noise effects. There are no City-adopted policies or standards that relate to ground-borne vibration, but the Federal Transit Administration (FTA), the California Department of Transportation (Caltrans), and the County of Los Angeles do have such policies and/or standards. The government agency policies that are relevant to project construction and operation noise levels are discussed below.

(1) City of Los Angeles Standards and Guidelines

The Los Angeles Municipal Code (LAMC) (Section 41.40 and Chapter XI, Articles 1 through 6) establishes regulations regarding allowable increases in noise levels in terms of established noise criteria. Supplementing these LAMC regulations, the City has also established CNEL guidelines that are used for land use planning purposes. Those regulations and guidelines are described in more detail below.

(a) City of Los Angeles Noise Regulation

Chapter XI of the Los Angeles Municipal Code (Noise Regulation) establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulation, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. For purposes of determining whether or not a violation of the Noise Regulation is occurring, the sound level measurements of an offending noise that has a duration of five minutes or less during a one-hour period is reduced by 5 dBA to account for people's increased tolerance for short-duration noise events. In cases in which the actual measured ambient noise level is not known, the presumed ambient noise levels, as indicated in Table IV.G-1 on page IV.G-4 is used.

The Noise Regulation also limits noise from construction equipment within 500 feet of a residential zone to 75 dBA, measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.[4] The Noise Regulation prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday and on Saturday before 8:00 A.M. and after 6:00 P.M., and does not allow construction noise on Sunday or on a national holiday.[5]

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[4] *In accordance with the Noise Regulation (Los Angeles Municipal Code, Section 112.05), 'technically infeasible' means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.*

[5] *Los Angeles Municipal Code, Section 41.40.*

Table IV.G-1
Presumed Ambient Noise Levels (dBA)

Zone	Day	Night
Residential	50	40
Commercial	60	55
Manufacturing (M1, MR1, MR2)	60	55
Heavy Manufacturing (M2, M3)	65	65

Source: Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03.

(b) City of Los Angeles CNEL Guidelines

The City of Los Angeles has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the State Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the *City of L.A. CEQA Thresholds Guide (2006)* in terms of the CNEL. CNEL guidelines for specific land uses are classified into four categories: (1) "normally acceptable;" (2) "conditionally acceptable;" (3) "normally unacceptable;" and (4) "clearly unacceptable." As shown in Table IV.G-2 on page IV.G-5, a CNEL value of 70 dBA is the upper limit of what is considered a "normally acceptable" noise environment for business and professional commercial uses, and a CNEL as high as 77 dBA is considered "conditionally acceptable." For more sensitive uses such as multi-family residential, the upper limit of what is considered "normally acceptable" is set at 65 dBA CNEL.[6]

(2) Federal, State, and Local Government Ground-Borne Vibration Standards

The City of Los Angeles has not adopted policies or guidelines relative to ground-borne vibration. As such, the following is a summary of Los Angeles County, Caltrans, and Federal Transportation Agency (FTA) ground-borne vibration policies and guidelines. The Los Angeles County Noise Regulation (Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, but this applies to ground-borne vibrations from long-term operations activities, such as surface traffic corridor, not construction. With respect to ground-borne vibration from construction activities, the FTA and Caltrans have adopted guidelines/ recommendations to limit ground-borne vibration based on the age and/or condition of the structures that are located in close proximity to construction activity.

[6] *City of L.A. CEQA Thresholds Guide (2006), Section I.2.*

Table IV.G-2
City of Los Angeles Land Use Compatibility for Community Noise

Land Use	Community Noise Exposure CNEL, dBA			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single-Family, Duplex, Mobile Homes	50–60	55–70	70–75	Above 70
Multi-Family Homes	50–65	60–70	70–75	Above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50–70	60–70	70–80	Above 80
Transient Lodging—Motels, Hotels	50–65	60–70	70–80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50–70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50–75	—	Above 70
Playgrounds, Neighborhood Parks	50–70	—	67–75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50–75	—	70–80	Above 80
Office Buildings, Business and Professional Commercial	50–70	67–77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50–75	70–80	Above 75	—

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.
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 systems or air conditioning will normally suffice.
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.
Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: City of L.A. CEQA Thresholds Guide, 2006.

A technical discussion of construction activity-related vibration is provided in Section 12.2 of the FTA publication titled "Transit Noise and Vibration Impacts Assessments," April 1995. As described therein, a ground-borne vibration level of 0.2 inch-per-second peak particle velocity (PPV) should be considered as damage threshold criterion for structures deemed "fragile," and a ground-borne vibration level of 0.12 inch-per-second PPV should be considered as damage criterion for structures deemed "extremely fragile," such as historic buildings. With respect to residential and commercial structures, Caltrans' technical publication titled "Transportation- and Construction-Induced Vibration Guidance Manual" June 2004, provides a vibration damage potential threshold criteria of 0.5 inch-per-second PPV for older residential structures, 1.0 inch-per-second PPV for newer residential structures, and 2.0 inch-per-second PPV for modern industrial/commercial buildings.

c. Existing Local Noise Conditions

The predominant noise source within the project vicinity is roadway noise from local thoroughfares such as Sunset Boulevard and Hollywood Boulevard, and surrounding streets including Gower Street, El Centro Avenue and Selma Avenue. Other community noise sources include incidental noise from existing commercial, light industrial, residential, and school uses, ambulance sirens, distant aircraft over-flights, and landscaping maintenance activities at nearby residential and commercial uses.

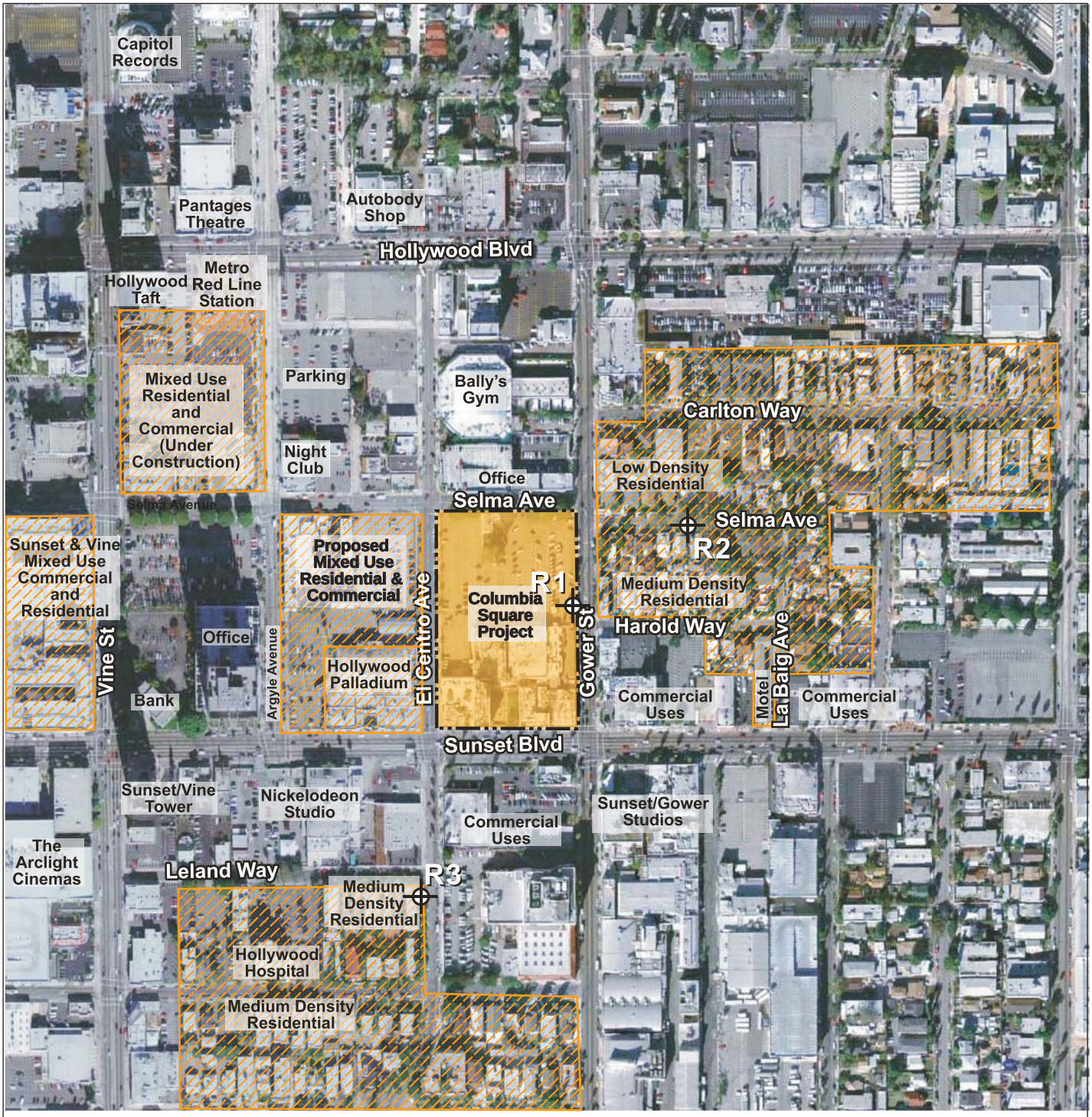
(1) Noise-Sensitive Receptors

Some land uses are considered more sensitive to noise than others due to the amount of noise exposure and the types of activities typically involved at the receptor location. The *City of L.A. CEQA Thresholds Guide (2006)* states that residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, and parks are generally more sensitive to noise than commercial and industrial land uses. Noise sensitive receptors were selected based on the relative distance from the receptors to the project site (i.e., within 500 feet), in accordance with the *City of L.A. CEQA Thresholds Guide* screening criteria. For a more conservative analysis, noise sensitive receptors within 1,000 feet were also considered. Existing land uses, including noise sensitive land uses (sensitive receptor locations) within 1,000 feet of the project site are shown in Figure IV.G-1 on page IV.G-7 and include the following:

- East of the project site. There are residential uses just east of the project site along Selma Avenue and Harold Way, approximately 75 feet from the project boundary (represented by noise monitoring location R1). These residential uses extend further east to La Baig Avenue (approximately 500 feet east of the project site), represented by noise monitoring location R2.

- North of the project site. There are residential uses northeast of the project site, along Carlton Way, east of Gower Street. The ambient noise environment at this location would be similar to noise monitoring locations R1 and R2.

- South of the project site. The nearest residential uses to the south of the project site are located along El Centro Avenue, just south of Leland Way, approximately 400 feet from the project site, represented by noise monitoring location R3. Additionally, the Hollywood Community Hospital is located just south of Leland Way and west of El Centro Avenue, approximately 700 feet southwest from the project site.



Columbia Square

Figure IV.G-1
Existing Noise Sensitive Uses and Noise Monitoring Locations

matrix environmental

Source: Google Earth Pro 2006; Sanborn 2006; and Matrix Environmental 2008

- West of the project site. The nearest residential uses are located at the northwest quadrant of Sunset Boulevard and Vine Street (Sunset and Vine mixed-use commercial and residential), approximately 900 feet from the project site. In addition, there is a mixed-use residential and commercial development (the Legacy Project) under construction at the northwest corner of Argyle Avenue and Selma Avenue approximately 450 feet west from the project site as well as a proposed mixed-use residential and commercial development (the Hollywood Palladium project), located across the project site along El Centro Avenue, approximately 70 feet west of the project site.

(2) Ambient Noise Levels

Ambient noise measurements were conducted at three locations, R1, R2, and R3. These locations represent the nearby land uses in the vicinity of the project site as indicated on Figure IV.G-1 and described above, including the future residential uses at the project site (represented by R1). Long-term (24-hour) measurements were conducted at location R1 and short-term (15-minute) measurements during daytime and nighttime hours were recorded at the remaining two locations (R2 and R3). The ambient noise measurements were made in accordance with the City's standards, which require ambient noise to be measured over period of at least 15 minutes.[7] Furthermore, a 15-minute measurement is a reasonable duration for sampling ambient noise levels where street traffic is the dominant source (typical of urban environment), as traffic noise generally does not vary significantly within an hour. Ambient sound measurements were conducted from April 5, 2007 to April 6, 2007, to characterize the existing noise environment in the project vicinity.

The ambient noise measurements were conducted using the Larson-Davis 820 Precision Integrated Sound Level Meter (SLM). The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute (ANSI) S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification. The microphone was placed at a height of 5 feet above the local grade.

Table IV.G-3 on page IV.G-9 provides a summary of the ambient noise measurements taken at the three locations. As shown therein, the measured CNEL at the project site is 69.0 dBA, on the east side of the project site (location R1); an estimated CNEL of 60.0 dBA for residential along Selma Avenue east of the project site (location R2); and CNEL of 70.0 dBA for residential southwest of the project site along Leland Way and El Centro Avenue. Based on field observation, the ambient noise at the measurement locations is dominated by local traffic and, to a lesser extent, helicopter flyovers and other typical urban noise. Based on the City of Los Angeles community noise/land use

[7] *Los Angeles Municipal Code, Section 111.01.*

Table IV.G-3
Summary of Ambient Noise Measurements

Measurement Location	Measured Ambient Noise Levels, (dBA) Daytime (7 A.M. to 10 P.M.) Hourly L_{eq}	Nighttime (10 P.M. to 7 A.M.) Hourly L_{eq}	24-Hour Average, CNEL
R1 – Project east boundary. (24 hr measurements)	62.4 – 66.5 [a]	58.3 – 65.1 [a]	69.0
R2 – Residential on Selma Avenue, east of project site. (15-minute measurements)	54.6 [b]	56.3 [c]	60.0 [d]
R3 – Residential southwest of project site, at southwest corner of Leland Way & El Centro Avenue. (15-minute measurements)	67.4 [b]	65.0 [c]	70.0 [d]

[a] *Detailed measured noise data, including hourly L_{eq} levels, are included in Appendix F.*
[b] *Measured during daytime hours between 1 P.M. and 2 P.M.*
[c] *Measured during nighttime hours between 11 P.M. and 12 A.M. (midnight)*
[d] *Estimated based on short-term (15-minute) noise measurement and nearby long-term measurements.*

Source: PCR Services Corporation, 2007.

compatibility criteria provided earlier in Table IV.G-2 for multi-family residential uses, the noise environment at the measurement locations is generally considered "conditionally acceptable".[8]

To further characterize the area's noise environment, the CNEL generated by existing traffic on local roadways was established using roadway noise equations provided in the Caltrans Technical Noise Supplement (TeNS) document and traffic volume data provided by the project's traffic consultant. As indicated in Table IV.G-4 on page IV.G-10, the calculated CNEL for the analyzed roadway segments as a result of existing traffic volumes ranged from 51.9 dBA CNEL to 69.7 dBA CNEL at 25 feet from the roadway right- of-way based on surface-street traffic volumes only. These noise levels are generally consistent with the measured noise levels discussed earlier and provided in Table IV.G-3. Most land uses located near the project site are currently exposed to community noise levels from traffic (at the right-of-way) that are "conditionally acceptable" as categorized by the City of Los Angeles Land Use Compatibility Matrix for Community Noise (refer to Table IV.G-2).

[8] *The project site is proposed to be zoned Commercial, but would be developed as a mixed commercial/residential use. As such, the project site may be classified as "Multi-family homes" (see Table IV.G-2 on page IV.G-5).*

Table IV.G-4
Predicted Existing Vehicular Traffic Noise Levels

Roadway Segment	Adjacent Land Use	Predicted Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way		Noise Exposure Compatibility[a]
		25 feet	50 feet	
Gower Street				
North of Franklin Ave.	Residential	57.9	56.1	2
Between Franklin Ave. & US 101	Residential	66.4	64.8	2
Between US 101 & Hollywood Blvd.	Residential	67.2	65.5	2
Between Hollywood Blvd. & Sunset Blvd.	Residential	66.9	65.1	2
Between Sunset Blvd. & Fountain Ave.	Residential	66.3	64.6	2
Between Fountain Ave. & Santa Monica Blvd.	Residential	66.1	64.3	2
Franklin Avenue				
Between Argyle Ave. & Gower St.	Residential	69.6	68.1	2
East of Gower St.	Residential	69.5	67.9	2
Bronson Avenue				
North of Hollywood Blvd.	Residential	63.6	61.8	2
Between Hollywood Blvd. & Sunset Blvd.	Residential	65.7	63.9	2
South of Sunset Blvd.	Residential	65.5	63.8	2
El Centro Avenue				
Between Hollywood Blvd. & Sunset Blvd.	Residential/Commercial	61.0	59.3	2
Between Sunset Blvd. & De Longpre Ave.	Residential/Commercial	62.0	60.2	2
Between De Longpre Ave. & Fountain Ave.	Residential	60.5	58.8	2
South of Fountain Ave.	Residential	59.7	58.0	2
Hollywood Boulevard				
East of US 101	Residential	69.7	68.1	2
Argyle Avenue				
North of Franklin Ave.	Residential	62.3	60.7	2
Selma Avenue				
Between Argyle Ave. & Gower St.	Commercial	59.2	57.5	1
East of Gower St.	Residential	51.9	50.1	1
De Longpre Avenue				
West of El Centro Ave.	Residential	58.0	56.2	2
East of El Centro Ave.	Residential	55.9	54.1	2
Fountain Avenue				
West of El Centro Ave.	Commercial	64.8	63.1	1
Between El Centro Ave. and Gower St.	Residential	64.7	62.9	2
East of Gower St.	Commercial/Residential	64.8	63.0	2

[a] *1 = Normally Acceptable, 2 = Conditionally Acceptable. Based on predicted noise levels at 25 feet from the roadway right-of-way.*

Source: PCR Services Corporation, 2008.

3. Project Impacts

a. Methodology

(1) On-Site Construction Noise

On-site construction and construction trucks staging and hauling route noise impacts are evaluated by determining the noise levels generated by the different types of construction activity, calculating the construction-related noise level at nearby sensitive receptor locations, and comparing these construction-related noise levels to existing ambient noise levels (i.e., noise levels without construction noise). More specifically, the following steps were undertaken to calculate construction-period noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table IV.G-3) and/or presumed noise level as stated in the LAMC, Section 111.03 (see Table IV.G-1);

2. Typical noise levels for each type of construction equipment were obtained from the Federal Highway Administration's (FHWA) Roadway Construction Noise Model;

3. Distances between construction site locations (noise source) and surrounding sensitive receptors were measured using project architectural drawings, Google Earth and site plans;

4. The construction noise level was then calculated for sensitive receptor locations based on the conventional standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance; and

5. The resulting noise level was compared to the construction noise significance thresholds identified below.

(2) Off-Site Roadway Noise (During Construction and Project Operations)

Roadway noise impacts are evaluated using the Caltrans TeNS methodology with the roadway traffic volume data provided in the project's Traffic Study. This methodology allows for the definition of roadway configurations, barrier information (if any), and receiver locations. Roadway-noise attributable to project development is calculated and compared to baseline noise levels that would occur under the "No Project" condition.

(3) Stationary Point-Source Noise (During Project Operations)

Stationary point-source noise impacts are evaluated by identifying the noise levels generated by outdoor stationary noise sources, such as rooftop mechanical equipment and loading dock activities, calculating the hourly L_{eq} noise level from each noise source at surrounding sensitive receiver property line locations, and comparing such noise levels to existing ambient noise levels. More specifically, the following steps were undertaken to calculate outdoor stationary point-source noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table IV.G-3) and/or presumed noise level as stated in LAMC, Section 111.03 (see Table IV.G-1);

2. Parking facility operation noise levels were estimated based on actual data obtained at a similar parking structure facility;

3. Distances between stationary noise sources and surrounding sensitive receptor locations were measured using project architectural drawings, Google Earth and site plans;

4. Stationary-source noise levels were then calculated for each sensitive receptor location based on the conventional standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance;

5. Noise level increases were compared to the stationary source noise significance thresholds identified below;

6. With regard to outdoor mechanical equipment, such outdoor mechanical equipment is specified, as part of the project design features, to comply with the LAMC noise ordinance standards and to fall below the significance threshold of a maximum of 5 dBA above the ambient noise levels.

b. Significance Thresholds

(1) Construction Noise

Based on criteria set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, the project would have a significant impact on noise levels during construction if:

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

- Construction activities lasting more than 10 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 at anytime on Sunday.

(2) Construction Vibration

The City of Los Angeles does not have a significance threshold to assess vibration impacts during construction. Thus, the FTA and Caltrans standards described earlier are used to evaluate potential impacts related to project construction. As described earlier, FTA provides a ground-borne vibration level of 0.2 inch-per-second peak particle velocity (PPV) as the damage threshold criterion for structures deemed "fragile," and a ground-borne vibration level of 0.12 inch-per-second PPV as the damage criterion for structures deemed "extremely fragile," such as historic buildings. Caltrans provides a vibration damage potential threshold criteria of 0.5 inch-per-second PPV for older residential structures, 1.0 inch-per-second PPV for newer residential structures, and 2.0 inch-per-second PPV for modern industrial/commercial buildings. All structures that are located within the vicinity of the project site are considered "well engineered" (as opposed to "fragile" or "extremely fragile") and newer and modern; therefore, impacts relative to ground-borne vibration would be considered significant if either of the following future events were to occur:

- Project construction activities cause a PPV ground-borne vibration level to exceed 0.5 inches per second at any off-site residential structures; or

- Project construction activities cause a PPV ground-borne vibration level to exceed 2.0 inches per second at any off-site industrial/commercial structures.

(3) Noise from Project Operations

Based on criteria set forth in the *City of L.A. CEQA Thresholds Guide (2006)* and the City's Noise Ordinance, the project would 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 (see Table IV.G-2), or by 5 dBA in CNEL within the "normally acceptable" or "conditionally acceptable" category.

- Project-related operational (i.e., non-roadway) noise sources such as outdoor building mechanical/electrical equipment increase ambient noise level by 5 dBA, thus causing a violation of the City Noise Ordinance.

- The maximum noise (L_{max}) generated from the operation of the parking structure (i.e., car alarm) exceeds the average (L_{eq}) ambient noise level by 10 dBA.

The *City of L.A. CEQA Thresholds Guide (2006)* does not recommend a significant threshold for interior residential noise levels. However, the City of Los Angeles Building Code states that the interior noise level within residential structures shall not exceed a maximum 45 dBA (CNEL). Therefore, a significant interior noise impact would result if:

- Proposed residential uses are exposed to an exterior noise level of greater than 65 dBA CNEL for outdoor living areas (excluding balconies) or an interior noise level of greater than 45 dBA CNEL.

(4) Ground-Borne Vibration from Project Operations

The City of Los Angeles does not have a specific significance threshold to assess vibration impacts due to long-term project operations. Thus, the County of Los Angeles standard for human perception described earlier is used to evaluate potential impacts related to project operations. Therefore, impacts relative to ground-borne vibration would be considered significant if the following future event were to occur:

- Project operational activities generate a ground-borne vibration level of 0.01 inches per second RMS or higher at any off-site structure.

c. Project Design Features

The following project design features have a potential to influence project-related noise characteristics, and therefore, were taken into account during the analysis of potential project impacts.

(1) Project Construction

In accordance with the LAMC, construction activities would be limited to 7:00 A.M. to 9:00 P.M., Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturdays and holidays. No construction activities would occur on Sundays. Most, if not all, truck trips would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) to minimize generating truck trips during the P.M. peak hours.

The project contractor(s) would equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards.

(2) Project Operations

- All building outdoor mounted mechanical and electrical equipment would be designed to meet the noise requirements of LAMC, Chapter XI, Section 112.02.

- In addition, all outdoor loading dock and trash/recycling areas would be fully or partially enclosed such that the line-of-sight between these noise sources (loading dock service area) and any adjacent noise sensitive land use would be obstructed.

d. Analysis of Project Impacts

(1) Construction Noise

The project would be constructed in approximately 48 months, from 2009 to 2013. Project construction would commence with the demolition of some of the existing structures, which would last approximately four to six months. The grading and excavation activities would occur over approximately four to six months. Construction of the proposed buildings would occur over a two-year period, with building finishes occurring over 12 months. It is anticipated that a conventional foundation system (i.e., no deep piles) would be utilized for the proposed project structures, per the project's geotechnical investigation report for the project.[9] In addition, project construction would require soldier piles for shoring during the site excavation phase. However, the drilled and cast-in-place method would be utilized for the placement of soldier piles rather than the impact pile driving method since the drilled and cast-in-place method would generate relatively lower noise and vibration than the impact pile driving method.[10]

(a) On-Site Construction Noise

Noise from construction activities would be generated by vehicles and equipment involved during various stages of construction operations, including demolition, site clearing and grading, and building construction. The noise levels created by construction equipment will vary depending on factors such as the type of equipment, the specific model, the operation being performed and the condition of the equipment. Construction

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[9] *Geocon, Proposed Mixed-Use High-Rise Development 6121 Sunset Blvd., 1535 El Centro Ave., & 6110-6130 Selman Ave. Geotechnical Investigation, December 2006.*

[10] *Federal Transit Administration, "Transit Noise and Vibration Impact Assessment", Section 12.1.3, 1995*

noise associated with the project was analyzed using a mix of typical construction equipment, estimated durations and construction phasing. Table IV.G-5 on page IV.G-17 provides the list of anticipated construction equipment to be used during construction, including the typical noise levels associated with such equipment.

Table IV.G-6 on page IV.G-18 provides the estimated construction noise levels at the nearby noise sensitive receptors (residential uses) and a comparison with the noise impact criteria. The estimated noise levels represent a worst case scenario because construction activities are analyzed as if they were occurring along the perimeter of the construction area, whereas, construction will actually typically occur in a limited area and at a further distance. In addition, the noise sensitive receptors that are located further from the construction site would experience less construction noise as sound diminishes away from the source and due to intervening buildings between the source and receiver.

As shown in Table IV.G-6, estimated noise levels from construction activities would exceed the project significance thresholds (5 dBA above the ambient noise level) at locations R1, R2, and the existing Hollywood Palladium event venue. The highest noise levels would occur during the site demolition, which would last approximately four to six months. During this period, the ambient noise levels would increase by about 17 dBA periodically when the heavy construction equipment operates near the project boundary, which would result in a significant on-site construction noise impact. Based on a site visit, the Hollywood Palladium does not have outdoor uses which could be impacted by the construction noise. However, construction activities could result in a significant impact during performances within the interior of the Hollywood Palladium.

In addition, there is a proposed mixed-use development project with residential uses (the Hollywood Palladium project) on the west side of El Centro Avenue across from the project site (north of the Hollywood Palladium event venue). The project construction activities could impact the future residential uses at the Hollywood Palladium project, in the event that the Hollywood Palladium project was to be approved, completed, and occupied prior to project construction commencement. As shown in Table IV.G-6, the planned residential tower of the Hollywood Palladium project is approximately 300 feet from the project site west and would be exposed to construction noise levels of up to 65 dBA (hourly L_{eq}). The estimated construction noise level would be consistent with the existing ambient noise levels of 62 to 67 dBA (L_{eq}), based on the measured ambient noise levels at R1. Therefore, construction noise impacts would be less than significant at the planned residential uses.

Table IV.G-5
Construction Equipment Noise Levels

Equipment	Typical Noise Level at 50 feet from Equipment, dBA (L_{max})
Backhoe	80
Bore/Drill Rig	84
Crane	81
Concrete Saw	90
Excavator	81
Grader	85
Forklift	75
Roller	80
Rubber Tired Dozer/Loader	79
Tractor	80
Paving Equipment	80

Source: FHWA Roadway Construction Noise Model, 2005.

(b) Off-Site Construction Noise (Haul Trucks)

In addition to the on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the project site throughout the project's construction period. Major noise sources would be haul trucks and delivery trucks. While construction workers would arrive from various directions, haul trucks and delivery trucks would generally access the site via El Centro Avenue and/or Gower Street and via Sunset Boulevard to the regional freeway system (i.e., Highway 101 or Interstate 10). The residential uses on Selma Avenue and Harold Way just east of Gower Street would have partial direct line-of-sight to the truck route. As described in Section II, Project Description, there would be approximately 190,000 cubic yards of soils to be exported during site excavation, which would require 80 truck trips per day. Based on an 8-hour workday, there would be approximately 15 truck trips on an hourly basis. It is estimated that the existing residences near Gower Street would be exposed to a noise level of approximately 62 dBA (hourly L_{eq}) due to project haul trucks, which is consistent with the existing daytime ambient noise environment of 62 to 67 dBA (location R1). The residential tower of the proposed Hollywood Palladium project would have partial line-of-sight to the truck route along El Centro Avenue, which is approximately 300 feet away. It is estimated that the residential tower would be exposed to a noise level of approximately 50 dBA (hourly L_{eq}) due to project haul trucks, which is estimated to be below the existing daytime ambient noise levels of 62 dBA in the area (location R1). In summary, the estimated noise level due to haul truck movements would not exceed the project significance threshold. Therefore, significant noise impacts would not be expected from off-site construction traffic.

Table IV.G-6
Summary Construction Noise Impacts

Sensitive Receptor	Nearest Distance between Receptor and Construction Site, feet	Estimated Construction Noise Levels by Construction Phase Hourly Leq (dBA)			Impact Threshold of Significance a (dBA)
		Demolition (4-6 months)	Excavation/ Grading (4-6 months)	Building Construction/ Finishes (36 months)	
R1 – Nearest residential east of project site	75	82	81	78	70
R2 – Residential east of project site	250	72	70	67	60
R3 – Residential southwest of project site	500	66	64	61	70
The Hollywood Palladium	75	82	81	78	70
The Planned Hollywood Palladium Project – Residential units west of project site	300	65[b]	64[b]	61[b]	70

[a] *5 dBA above the existing average daytime ambient noise levels.*
[b] *Partially shielded by the planned office building of the Hollywood Palladium project and the existing Hollywood Palladium building.*

Source: PCR Services Corporation, 2008.

(c) On-Site Construction Vibration

Construction machineries and operations can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibrations from construction activities rarely reach the levels that damage structures.

The FTA has published standard vibration velocities for construction equipment operations. The peak particle velocities for construction equipment pieces anticipated to be used during project construction are listed in Table IV.G-7 on page IV.G-20, and range from 0.003 to 0.089 inch-per-second PPV at 25 feet from the construction activities. With regard to the project, the highest level of ground-borne vibration would be generated primarily during site grading and foundation activities (e.g., installing piles).

The off-site structures located nearest the construction site are commercial buildings just north and west of the project site on the north side of Selma Avenue and the west side of El Centro Avenue, which are located approximately 50 feet from the closest edge of the construction site. In addition, the proposed Hollywood Palladium Project is located approximately 70 feet from the construction site. These off-site commercial buildings would likely experience ground vibration levels of up to 0.032 inch-per-second and 0.02 inch-per-second PPV, respectively, during the site grading/excavation (while using major construction equipment such as large bulldozer, drilling for placement of piles and loaded trucks.) The closet residences are located east of the project site along Harold Way and Selma Avenue. These residences would likely expose to ground vibration levels of up to 0.017 inch-per-second PPV during construction period when heavy equipment are used, (i.e., site grading/excavation). As the estimated vibration levels are below the 0.5 inch-per-second and 2.0 inch-per-second PPV significance thresholds for residential structures and commercial buildings, respectively, vibration impacts associated with construction would be less than significant and no mitigation measures are required.

(2) Long-Term Operations Noise (Post-Construction)

This section provides a discussion of potential noise impacts related to the long-term operations of the project on neighboring noise-sensitive receptor locations, as well as the potential impacts of the existing noise environment on the project's proposed on-site

Table IV.G-7
Construction Equipment Vibration Levels

Equipment	Reference Vibration Level at 25 feet [a], inch/second (PPV)	Estimated Vibration Levels at 50 feet [b], inch/second (PPV)	Estimated Vibration Levels at 75 feet [c], inch/second (PPV)
Large bulldozer	0.089	0.032	0.017
Caisson drilling	0.089	0.032	0.017
Loaded trucks	0.076	0.027	0.015
Jackhammer	0.035	0.013	0.007
Small bulldozer	0.003	0.001	0.001

[a] *USDOT Federal Transit Administration, 1995.*
[b] *PPV at 50 feet = (PPV at 25 feet) x (25 feet /50 feet)^1.5*
[c] *PPV at 75 feet = (PPV at 25 feet) x (25 feet /75 feet)^1.5*

Source: PCR Services Corporation, 2008.

residential and hotel uses. With respect to project impacts to neighboring noise-sensitive receptor locations, project-specific noise sources considered herein include off-site roadway noise; on-site mechanical equipment; loading and parking facilities; and outdoor entertainment facilities (i.e., restaurant outdoor dining areas and pool areas).

(a) Off-Site Roadway Noise

Potential noise impacts due to project-related off-site traffic were analyzed by estimating the increase in noise levels assumed with traffic volumes and comparative noise levels with existing conditions. Existing and future traffic volumes at the roadway segments near the project site were provided by the project's traffic consultant. With respect to project-related traffic increases, the relationship between the change in noise levels and the change in traffic volumes is logarithmic. Thus, a doubling in traffic volumes would result in an increase in noise levels of 3 dBA.

Table IV.G-8 on page IV.G-21 provides a summary of the off-site roadway noise analysis. Included on these tables are the calculated CNEL for the roadway segments with noise sensitive uses for the following scenarios: (1) existing conditions; (2) future without project; and (3) future with the project. As shown in Table IV.G-8, the largest project-related and cumulative traffic-related noise impact is anticipated to occur along the segment of Selma Avenue between Argyle Avenue and Gower Street. Project-related traffic would add 2.4 dBA CNEL to this roadway segment, while related project plus ambient growth traffic volumes are expected to add an additional 0.3 dBA CNEL to this roadway segment, for a combined total of 2.7 dBA CNEL. As the incremental increases in noise levels at all other analyzed locations are less than 2.7 dBA CNEL, and these noise level increases are less than the more conservative 3-dBA CNEL significance threshold, project roadway noise impacts are considered to be less than significant.

Table IV.G-8
Off-Site Traffic Noise Analysis

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway, CNEL (dBA)				
	Existing	Future Without Project	Future With Project	Project Increment	Cumulative Increment
Gower Street					
North of Franklin Avenue	57.9	59.0	59.5	0.5	1.6
Between Franklin Avenue & US 101	66.4	66.7	66.7	0.0	0.3
Between US 101 & Hollywood Boulevard	67.2	67.5	67.3	0.2	0.1
Between Hollywood Boulevard & Sunset Boulevard	66.9	67.2	67.7	0.5	0.8
Between Sunset Boulevard & Fountain Avenue	66.3	66.8	67.0	0.2	0.7
Between Fountain Avenue & Santa Monica Boulevard	66.1	66.4	67.0	0.6	0.9
Franklin Avenue					
Between Argyle Avenue & Gower Street	69.6	69.9	70.0	0.1	0.4
East of Gower Street	69.5	69.8	70.0	0.2	0.5
Bronson Avenue					
North of Hollywood Boulevard	63.6	64.1	64.3	0.2	0.7
Between Hollywood Boulevard & Sunset Boulevard	65.7	66.2	66.3	0.1	0.6
South of Sunset Boulevard	65.5	66.0	66.2	0.2	0.7
El Centro Avenue					
Between Hollywood Boulevard & Sunset Boulevard	61.0	61.6	63.5	1.9	2.5
Between Sunset Boulevard & De Longpre Avenue	62.0	62.4	63.2	0.8	1.2
Between De Longpre Avenue & Fountain Avenue	60.5	60.9	62.5	1.6	2.0
South of Fountain Avenue	59.7	60.2	61.0	0.8	1.3
Hollywood Boulevard					
East of US 101	69.7	70.0	70.4	0.4	0.7
Argyle Avenue					
North of Franklin Avenue	62.3	63.8	63.0	0.8	0.7
Selma Avenue					
Between Argyle Avenue & Gower Street	59.2	59.5	61.9	2.4	2.7
East of Gower Street	51.9	52.1	49.9	2.2	2.0
De Longpre Avenue					
West of El Centro Avenue	58.0	58.3	58.2	0.1	0.2
East of El Centro Avenue	55.9	56.2	56.3	0.1	0.4
Fountain Avenue					
West of El Centro Avenue	64.8	65.1	65.4	0.3	0.6
Between El Centro Avenue & Gower Street	64.7	64.9	65.0	0.1	0.3
East of Gower Street	64.8	65.0	65.0	0.0	0.2

Source: PCR Services Corporation, 2008.

(b) On-Site Stationary Noise

(i) Mechanical Equipment

The project would require mechanical equipment to condition and ventilate the indoor air environment. Such equipment generally consists of air handling units, condenser fans, exhaust fans (for buildings and parking structures) and emergency generators and are intended to support the function of the proposed structures. Project design features, as detailed in Section IV.G.2.c, above (Project Features), would ensure that noise levels from these equipment would comply with the City of Los Angeles Noise Ordinance requirements, (i.e., maximum 5 dBA above the ambient noise levels). Thus, based on the above threshold, mechanical equipment would not result in significant noise impacts.

(ii) Loading Dock

The project would include a loading dock at the northwest portion of the project site, with access from Selma Avenue. The loading dock would be located in an enclosed parking structure and would not have any unobstructed openings that face toward any noise sensitive receptor. Delivery trucks would access the loading docks from Selma Avenue. Loading/unloading activities would generate noise level of approximately 74 dBA L_{eq} at a reference distance of 25 feet for brief durations.

The nearest residential uses are located on Selma Avenue, east of the project site, and approximately 350 feet from the loading dock. The residential tower of the proposed Hollywood Palladium project is anticipated to be located approximately 400 feet from the loading dock. However, these residential units are shielded from the loading docks by the presence of existing intervening building structures. Accounting for distance attenuation and the acoustical shielding provided by intervening building structures, the loading dock activities noise level at the nearest residential uses would be approximately 40 dBA $L_{eq,}$ which is well below the existing ambient noise level of 55 dBA (measured at location R2, Table IV.G-3). Therefore, loading dock related noise levels would not result in significant noise impacts. As such, impacts would be less than significant, and no mitigation measures would be required.

(iii) Parking Facility Noise Levels

The project includes a nine-level parking facility that includes six above ground levels and three subterranean parking levels. The parking facility could be accessed from either El Centro Avenue, Selma Avenue, or Gower Avenue. Various noise events would periodically occur from the parking facilities including: activation of car alarms, sounding of car horns, slamming of car doors and tire squeals. Automobile movements would comprise the most continuous noise source and would generate a noise level of approximately

65 dBA at a distance of 25 feet. Car alarm and horn noise events would generate maximum noise levels of as high as 69 dBA at a reference distance of 50 feet.

The parking facility would be fully enclosed with the upper levels of the parking facility being surrounded by the new building structures, thus providing effective noise shielding to the nearby residential homes to the east of the project site. Thus, noise from the new fully enclosed parking structure at the nearby residential homes is expected to be less than the existing noise environment, which included an open parking lot. Therefore, the new subterranean and the enclosed parking structures would not expect to have noise impacts to any noise-sensitive receptor location. As such, impacts would be less than significant, and no mitigation measures are required.

(iv) Outdoor Entertainment Facilities

The project would include a restaurant located at the southwest portion of the project site (along El Centro Avenue). Potential noise associated with the proposed restaurant operation would include music at the outdoor dining area. The closest residential receptors to the outdoor dining area are approximately 450 feet to the east (along Harold Way east of Gower Street) and 600 feet to the southwest (R3). The off-site residential uses would be shielded from the outdoor dining area by the existing and future buildings. The existing ambient noise level at the residential uses to the east was measured as 55 dBA (receptor R2). In order not to exceed the City's Noise Regulation, the outdoor amplified music planned for the outdoor area at the proposed restaurant should have a noise limit of approximately 90 dBA at a distance of 50 feet from the center of the activities.

In addition, the project would include two outdoor pool facilities, one for the residences and one for the hotel, to be located near the site's core area above the podium level (approximately 64 feet above street level). The pool facilities would serve as a potential noise source for off-site sensitive receptors. The nearest sensitive receptors are located approximately 250 feet to the east (east of Gower Street). Both the residential and hotel pool areas would be shielded to the off-site sensitive receptors by project's buildings residential, office and hotel buildings. Thereby, outdoor related noises from pool areas will be effectively mitigated to the level of insignificant. However, in order to meet the City's noise regulation, outdoor amplified music at the pool areas should be limited to a maximum noise level of 90 dBA at a distance of 50 feet from the sources.

(v) Emergency Rooftop Helipad Noise Levels

The project would include a helipad on the roof of each of the two new high-rise buildings. Use of the helipad would be for emergency purposes only. Thus, based on the infrequent and emergency nature of such a use, adverse noise impacts related to helipad uses would be less than significant.

(c) Composite Noise Level Impacts from Project Operations

An evaluation of noise from all project sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum project-related noise level increase that may occur at the noise-sensitive receptor locations included in this analysis. The overall sound environment at the areas surrounding the project comprises contributions from each individual noise source associated with the typical daily operation of the project. Primary noise sources associated with the project would include traffic, mechanical equipment, parking facility, loading dock/refuse collection and outdoor entertainment uses.

Based on a review of the noise-sensitive receptors and the project's noise sources, the only noise-sensitive locations wherein composite noise impacts could occur are residential uses east of Gower Street (R1 and R2). Due to a combination of distance and the presence of intervening structures that would serve as noise barriers, the only project noise source that could potentially affect the other noise-sensitive locations included in this analysis is roadway noise, the potential impacts of which are fully analyzed above.

Based on the traffic noise analysis above, the project-related traffic is expected to increase the traffic-related noise by a maximum of 0.6 dBA (CNEL) along Gower Street, between Santa Monica Boulevard and Sunset Boulevard, which is represented by noise receptor R1. Project-related mechanical equipment, as described above, would be shielded to all noise sensitive receptors through project design features and would be designed to meet the City's Noise Ordinance (maximum of 5 dBA above the lowest ambient noise levels or City's presumed ambient noise levels). As indicated in Table IV.G-3, the lowest ambient noise levels are more than 10 dBA lower than the 24-hour CNEL levels. Therefore, project mechanical-related noise in terms of CNEL would be approximately 10 dBA below the overall ambient noise levels. The proposed parking facility would provide an effective noise attenuation as it would be enclosed. Therefore parking related noises would be insignificant as parking facility-related noise at the nearest receptors, R1 and R2, are estimated to be more than 10 dBA below the existing CNEL level. As previously mentioned, the loading docks and refuse collections would be located in the subterranean parking level, which will not have any unobstructed openings that face toward any noise-sensitive receptor location. Therefore, noise associated with the loading docks and refuse collection transference to the outside would negligible and would not increase the overall ambient noise levels. The outdoor entertainment uses including the restaurant outdoor dining and the roof level outdoor pools would be effectively shielded to the off-site residential uses. In addition, project's noise limit (included as Mitigation Measures) would ensure that the outdoor amplified music would meet the City's noise regulations, which would not increase the existing overall ambient noise levels.

In summary, at the residential uses east of Gower Street (R1 and R2), the project-related traffic is expected to increase the ambient noise by maximum of 0.6 dBA (CNEL). The mechanical and parking facility related noise are expected to be minimum 10 dBA below the existing ambient noise level, which will have a contribution of less than 1.0 dBA to the composite noise level. Overall, relative to the existing noise environment, the project is estimated to increase the ambient sound level at the nearest noise sensitive receptors by less than 2 dBA (CNEL). Composite noise impacts at all other receptors are expected to be less 1 dBA (CNEL). As such, the composite noise level impact due to the project would be less than significant.

(d) Land-use Compatibility (Proposed Residential and Hotel Uses)

The noise environment that currently exists surrounding the project site would also affect the project's proposed on-site residential and hotel uses. Residential and hotel uses are proposed at the northern portion of the project site and primarily facing Gower Street, Selma Avenue, and El Centro Avenue. As indicated by the noise measurement data presented in Table IV.G-3, the project site is currently exposed to noise levels up to 69 CNEL, due primarily to traffic on adjacent roadways. Currently, the baseline ambient noise level at times exceeds the City-recommended noise standard used for multi-family residential and hotel developments (65 dBA CNEL) for the site. Therefore, noise insulation features should be included in the design of the residential and hotel building, to reduce the noise level to 45 dBA (CNEL) at the interior of the building. Incorporation of the mitigation measures below would reduce potential impacts associated with the introduction of residential and hotel uses to a less than significant level.

(3) Ground-Borne Vibration from Project Operations

The project will include typical residential and commercial-grade stationary mechanical equipment such as air-conditioning (HVAC) and exhaust fans, which would produce vibration. However, the vibration generated by the mechanical equipment is typically negligible at off-site receptors as they are normally mounted on anti-vibration devices (vibration isolators) and are located within the building. The primary sources of transient vibration would include passenger vehicle circulation within the proposed subterranean parking facility, on-site refuse/delivery truck activity, and on-site loading dock/refuse collection area activity. The nearest off-site structures to the project are commercial and residential buildings located approximately 50 feet away, which would experience ground-borne vibration of 0.001 inch/second. The potential vibration impacts from all project sources at the closest structure locations would be less than the significance threshold of 0.01 inch/second (RMS). As such, vibration impacts associated with operation of the project would be below the significance threshold. Thus, impacts would be less than significant and no mitigation measures would be required.

4. Cumulative Impacts

As discussed in Section III of this EIR, there are 94 related projects in the surrounding area. Of the 94 related projects described, there are three related projects situated approximately 70 feet to 500 feet from the project site, including Related Project No. 60 – a 42 unit residential development at Carlton Way just east of Gower Street, Related project No. 40 – an office project at Sunset Boulevard and Gower Street, and No. 93 – Hollywood Palladium project at Sunset Boulevard and Argyle Avenue. The potential for noise impacts to occur are specific to the location of each related project as well as the cumulative traffic on the surrounding roadway network.

(1) Construction Noise and Vibration

Noise from on-site construction activities would only affect areas less than 500 feet from the construction site. As described above there are three related projects within 500 feet of the project site. Short-term cumulative impacts could occur at noise sensitive receptors located between the project and the three noted related projects. In addition, short-term cumulative impacts could occur at noise sensitive receptors where trucks from the project and related projects are using the same roadways that have adjacent sensitive uses. Thus, even with proposed mitigation measures, if nearby related projects were to be constructed concurrently with the project, significant and unavoidable cumulative construction noise impacts could result.

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the project, there is no potential for a cumulative construction- or operational-period impact with respect to ground-borne vibration.

(2) Long-Term Operations

The project site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from a number of community noise sources including vehicle travel, mechanical equipment (e.g., HVAC systems), and lawn maintenance activities. Each of the related projects that have been identified within the general project vicinity would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations.

All related projects are of a residential, retail, commercial, or institutional nature, and these uses are not typically associated with excessive exterior noise; however, each project would produce traffic volumes that would generate roadway noise. As discussed previously, traffic volumes from the project and related projects, combined with ambient growth traffic, were evaluated and presented in Table IV.G-8. Cumulative traffic volumes

would result in a maximum increase of 2.7 dBA CNEL along the segment of Selma Avenue, between Argyle Avenue and Gower Street. As this noise level increase would be below the more conservative 3 dBA CNEL significance threshold, roadway noise impacts due to cumulative traffic volumes would be less than significant.

Due to LAMC provisions that limit stationary-source noise from items such as roof-top mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project. For this reason, on-site noise produced by any related project would not be additive to project-related noise levels. As the project's composite stationary-source impacts would be less than significant, composite stationary-source noise impacts attributable to cumulative development would also be less than significant.

5. Mitigation Measures

a. Construction

As described above, noise associated with on-site construction activity would have the potential to result in a significant impact at nearby sensitive uses (including the Hollywood Palladium and residential uses). Therefore, the following feasible mitigation measures are recommended to minimize and reduce construction-related noise impacts.

Mitigation Measure G-1: Exterior noise generating construction activities shall be limited to Monday through Friday from 7:00 A.M. to 9:00 P.M., and from 8:00 A.M. to 6:00 P.M. on Saturdays. No construction activities shall occur on Sundays or any national holidays.

Mitigation Measure G-2: Effective temporary noise barriers, when they are feasible, shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptors (residential uses on Selma Avenue and Harold Way).

Mitigation Measure G-3: Noise-generating construction equipment operated at the project site shall be equipped with effective noise control devices (i.e., mufflers, lagging, and/or motor enclosures). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

Mitigation Measure G-4: Contractor shall coordinate with the Hollywood Palladium manager when noisy construction activities occur, such as during site demolition and excavation, to avoid conflicts with operations of the Hollywood Palladium (i.e. during performance events).

b. Operation

Mitigation Measure G-5: The outdoor amplified sound system for the restaurant outdoor dining and the outdoor pool areas shall be limited to a maximum sound level of 90 dBA at 50 feet.

Mitigation Measure G-6: An acoustical analysis of the architectural plans of the proposed residential and hotel building shall be prepared by a qualified acoustical engineer, prior to issuance of building permits, to ensure that the building construction (i.e., exterior wall, window and door) will provide adequate sound insulation to meet the acceptable interior noise level of 45 dBA CNEL, as required by the City's building code.

Mitigation Measure G-7: During project construction, impact pile driving shall not be permitted for the installation of soldier piles.

6. Level of Significance After Mitigation

a. Construction

Mitigation Measure G-1 would preclude construction-period noise impacts from occurring during the noise-sensitive night-time periods, or at any time on Sundays. Implementation of Mitigation Measure G-2 would provide 5 to 10 dB noise reduction, when the noise barriers break the line-of-sight between the construction equipment and the receivers. Noise level reductions attributable to Mitigation Measures G-3 and G-4, although not easily quantifiable, would ensure the noise level impact associated with construction activities minimized to the extent practicable. Thus, project construction activities would intermittently increase the daytime noise levels at the noise sensitive receptors during the site demolition and initial stages of site grading/excavation activities by more than the 5 dBA significance threshold. As such, noise impacts during construction are concluded to be significant and unavoidable.

b. Operation

The project would not result in any significant noise impacts to off-site noise sensitive receptors during long-term project operations. Implementation of Mitigation Measure G-5 would ensure that the outdoor entertainment uses meet the City's noise regulations at the nearby sensitive receptors. Implementation of Mitigation Measure G-6 would ensure the interior of the residential and hotel units meet the 45 dBA (CNEL) requirement. As such, operational noise impacts would be less than significant.

IV. Environmental Impact Analysis

H.1 Public Services - Fire Protection

1. Introduction

This section describes existing fire protection and emergency medical services provided by the City of Los Angeles Fire Department (LAFD) and analyzes potential impacts related to these services that would occur as a result of implementation of the project. The impact analysis addresses fire protection facilities, service capacity, fire flow, emergency response times, emergency access and fire safety equipment. The analysis is based on information provided by the LAFD Planning Section, which is provided in Appendix H of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State of California

The California Building Code (CBC), found in the California Code of Regulations (CCR) Title 24, is a compilation of building standards, and includes fire safety standards for residential buildings. CBC standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards, authorized by the California legislature, but not covered by the national model code. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies. The most current CBC is the 2007 CBC which became effective on January 1, 2008.

The CBC includes the California Fire Code (CFC) [CCR, Title 24, Part 9]. Typical fire safety requirements of the CFC include the installation of fire sprinklers in all high-rise buildings, the establishment of fire resistance standards for fire doors, building materials, and particular types of construction, and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. Specific CBC fire safety regulations have been incorporated by reference in the Los Angeles Municipal Code (LAMC). Chapter 7 of the CBC is incorporated by reference in Chapter 9 (Section 91.700)

of the LAMC regarding the use of fire-resistant building materials, fire suppression systems, and other fire safety elements related to the design and construction of high-rise buildings. The CFC is incorporated by reference in Chapter 9 (Section 91.900) of the LAMC regarding fire protection systems.

(2) City of Los Angeles

(a) Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework Element (Framework), adopted in December 1996 and readopted in August 2001, provides a comprehensive, long-range strategy for accommodating long-term growth in the City of Los Angeles (City) and defines Citywide policies regarding several issues including infrastructure and public services. The Infrastructure and Public Services Chapter of the Framework sets forth goals, objectives, and policies for fire protection and emergency medical services (EMS) in the City. The objectives and policies of Goal 9J of the Infrastructure and Public Services Chapter ensure that every neighborhood has the necessary level of fire protection service, EMS, and infrastructure. Under the Framework, the City standard for response distance from the fire station to the destination location is 1.5 miles.[1]

(b) General Plan Safety Element

The General Plan Safety Element (Safety Element), adopted on November 26, 1996, contains policies related to the City's response to hazards and natural disasters such as fires. The fire response policies of the Safety Element set forth requirements, procedures, and standards to facilitate effective fire suppression. Under Policy 2.1.6 of the Safety Element, the LAFD is charged with the responsibility to maintain, enforce, and upgrade requirements, procedures, and standards to facilitate effective fire suppression including peak load water flow, and building and fire code regulations such as minimum road widths, access, and clearances around structures. The LAFD shall also revise regulations or procedures to include the establishment of minimum standards for the location and expansion of fire facilities based on fire flow, intensity and type of land use, life hazard, occupancy, and degree of hazard so as to provide adequate fire and EMS response.

[1] *City of Los Angeles General Plan Framework, page 9-5.*

(c) Los Angeles Municipal Code

All new construction must comply with the applicable provisions as set forth in the LAMC. Under the Fire Protection and Prevention Chapter of the LAMC, Article 7 (Fire Code), the LAFD's Bureau of Fire Prevention and Public Safety is required to administer and enforce basic building regulations set by the State Fire Marshal. The LAMC also contains, by reference, the CBC building construction standards, including the CFC. The Fire Code contained within the LAMC also reflects the policies of the General Plan Safety Element. The Fire Code sets forth regulatory requirements pertaining to the prevention of fires, the investigation of fires or life safety hazards, the elimination of fire and life safety hazards in any building or structure including buildings under construction, the maintenance of fire protection equipment and systems, and the regulation of the storage, use, and handling of hazardous materials.[2]

Chapter 5, Article 7, Division 9 of the Fire Code addresses access, hydrants, and fire flow requirements. Under Division 9 (Section 57.09.03), if any portion of an exterior wall is more than 150 feet from the edge of a roadway, an approved, posted fire lane shall be provided. Division 9 (Section 57.09.06) also establishes fire flow standards. Fire flow is defined as the quantity of water available or needed for fire protection in a given area and is normally measured in gallons per minute (gpm), as well as duration of flow. The determination of fire flow adequacy varies, depending on the type of land use (with greater intensity land uses requiring higher flows from a greater number of hydrants), life hazard, occupancy, and the degree of fire hazard. The specific public fire flow requirements for a project are determined by the LAFD. Typically, the fire flow required for a high density residential use is 4,000 gpm from four adjacent hydrants flowing simultaneously. Fire flow required for a commercial or industrial use is between 6,000 to 9,000 gpm flowing from four to six adjacent hydrants simultaneously. The fire flow required for a high density commercial or industrial use is 12,000 gpm available to any block. A minimum residual water pressure of 20 pounds per square inch (psi) is required to remain in the water system in addition to the required gpm flow.

Fire hydrant spacing and hydrant type is also determined according to land use. For high-density residential uses, one hydrant per 100,000 square feet of land is required with a 300- to 450-foot distance between hydrants. A 2 ½-inch by 4-inch double fire hydrant is required for this land use. For commercial use, one hydrant per 80,000 square feet of land is required with a 300-foot distance between hydrants. A 2 ½-inch by 4-inch double fire hydrant or 4-inch by 4-inch double fire hydrant is required. Furthermore, every first story of

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[2] *City of Los Angeles Municipal Code, Article 7, Chapter V, Section 57.01.02., Amended in Entirety, Ordinance Number 162,123, effective May 12, 1987.*

a residential unit and all first story portions of any commercial or industrial building must be within 300 feet of an approved hydrant.

Chapter 5, Article 7, Division 9 (Section 57.09.07) of the Fire Code limits the maximum response distance from a high density residential and commercial neighborhood to a fire station with an engine or truck company to 1.5 miles. The maximum response distance from a commercial development to a fire station with an engine company is one mile and to a fire station with a truck company is 1.5 miles. For a central business district, the maximum response distance to a fire station with an engine company is 0.75 mile and to a fire station with a truck company is one mile. Where a response distance is greater than that allowed, all structures must be constructed with automatic fire sprinkler systems. Division 9 (Section 57.09.08) also provides for supplemental fire protection in which equipment and systems not otherwise required in the LAMC may be required by the LAFD.

Division 112 (Section 57.112.07) of the Fire Code requires that all smoke control systems be retested every six months or in accordance with the retest requirements established by the Department of Building and Safety and the LAFD. Additionally, under Division 9 (Section 91.905.15.11), all smoke-control systems shall be tested prior to the Certificate of Occupancy.

Division 118 of the Fire Code classifies buildings where the highest floor level is more than 75 feet above the lowest point of fire access as high-rises. Buildings classified as high-rises are subject to specific requirements for fire safety. Division 118 requires that each high-rise building include a Fire Control Station that contains a public address system and telephones for LAFD use, a fire detection and fire alarm system, an elevator recall switch and a status panel for all elevator cars, sprinkler control system, standby power and emergency electrical power controls, controls for unlocking stairshaft doors, smoke evacuation and fan controls, stairway pressurization control switches, and status indicators for fire pumps and water supply. Furthermore, under Division 118, a sound-powered telephone communication system shall be located at every floor in each enclosed exit stairway, at every exterior location where an enclosed stairway exits to a public way, on the roof, and in every elevator car. In addition, a high-rise building must have at least one emergency and fire control elevator in each bank of elevators (Sec. 57.118.05), a dependable method of sounding a fire alarm throughout the building (Sec. 57.118.06), an emergency smoke control system (Sec. 57.118.07), a standby and emergency power system (Sec. 57.118.08), stairshaft doors for fire department use (Sec. 57.118.09), pressurized stairshafts (Sec. 57.118.10), and other devices operable from the Control Station, as previously listed. Division 118 also requires the installation of automatic sprinkler systems in all new high-rise buildings as well as a rooftop emergency helicopter landing facility for each building in a location approved by the Fire Department Chief.

Fire Code Division 119 requires an annual inspection of high-rise buildings. Inspection includes the evaluation of physical access, property condition, and all fire-safety facilities and equipment required under the LAMC Fire and Building Codes. An LAFD fire safety inspection is performed every six months on automatic fire extinguishing systems. Annual fire safety inspections are for fire warning systems, central station signaling systems, smoke management systems, elevators, emergency generator and lighting systems, fire doors, fire pumps, pressure reducing valves, and fire escapes. Under LAMC Chapter 9, Section 91.905.15, all smoke control systems shall be tested prior to the issuance of a Certificate of Occupancy and, after occupancy of the building, all operating parts of the smoke-control systems shall be retested every six months in accordance with the retest requirements established by the Department of Building and Safety and the LAFD.

The LAFD Fire Prevention Bureau also administers guidelines for the Sequence of Operations for Life Safety Systems in High-Rise Buildings. These guidelines address the management of life-safety systems and facilities, including a sequence of procedures involving monitoring and management of audible and visual alarm signals; elevator lobby smoke detectors; duct smoke detectors; elevator shaft smoke/heat detectors; sprinkler valve flow switches; and smoke/fire dampers on each floor. The Fire Code also requires stairway numbering on each floor, roof access, and fire safety signage on all floors in prescribed locations.

(d) City of Los Angeles Propositions

The City of Los Angeles Fire Facilities Bond (Proposition F), approved by voters in November 2000, allocates $378.6 million to build 19 new or replacement neighborhood fire/paramedic stations. Of the 20 Proposition F projects, one project, Fire Station No. 82, is located in the Hollywood area. This station is to be replaced with a new regional fire station which will involve either relocation or demolition and construction at the current site. In addition, in March 2002, Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters for $600 million to renovate, improve, expand and construct police, fire, 911, and paramedic facilities and involves 13 projects.[3] None of the projects funded under Proposition Q is located within the project vicinity. Measure J, which was approved by voters at the November 7, 2006 County State General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Currently under Proposition F, the construction of new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at

[3] *http://www.lapropq.org/modules/fileUpload/files/Prop_Q_Report__NOV06.pdf.*

least two acres. Measure J allows new regional fire stations funded by Proposition F located in densely developed areas to be designed and built on one or more properties equaling less than two acres.

b. Existing Conditions

In the City of Los Angeles, fire prevention and suppression services are provided by the LAFD. In accordance with the Los Angeles City Charter, Section 520, the LAFD's duty is to "control and extinguish injurious or dangerous fires and to remove that which is liable to cause those fires; to enforce all ordinances and laws relating to the prevention or spread of fires, fire control and fire hazards within the City; to conduct fire investigations; and to protect lives and property in case of disaster or public calamity." The LAFD is a full-spectrum life safety agency serving a population of approximately 4 million throughout the City of Los Angeles and its environs. The LAFD has approximately 3,594 uniformed personnel providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, and public education and community services. There are 106 neighborhood fire stations covering 471 square miles within the LAFD's jurisdiction. At any given time, a total of 1,101 firefighters, including 226 paramedics, are on 24-hour duty.[4] In addition, the LAFD is supported by 346 technical and administrative personnel.[5] During the year 2007, the LAFD had 757,203 responses.[6]

As shown in Figure IV.H-1 on page IV.H-7, three LAFD fire stations are located near the project site. Fire Station No. 27 is located at 1327 North Cole Avenue, approximately 0.55 miles southwest of the project site. Fire Station No. 82 is located at 1800 North Bronson Avenue, approximately 0.5 miles northeast of the project site, and Fire Station No. 41 is located at 1439 N. Gardner Street, approximately 1.75 miles west of the project site.[7] The location, distance, response time, staffing, and equipment of each of these fire stations are summarized in Table IV.H-1 on page IV.H-8.

The project site is located within the neighborhood boundaries of Fire Station No. 27, which is designated as the "first-in" station to the project site in the event of emergencies. "First-in" districts are determined by the response time and distance between the site and the City's fire station, which are generally located at halfway points between

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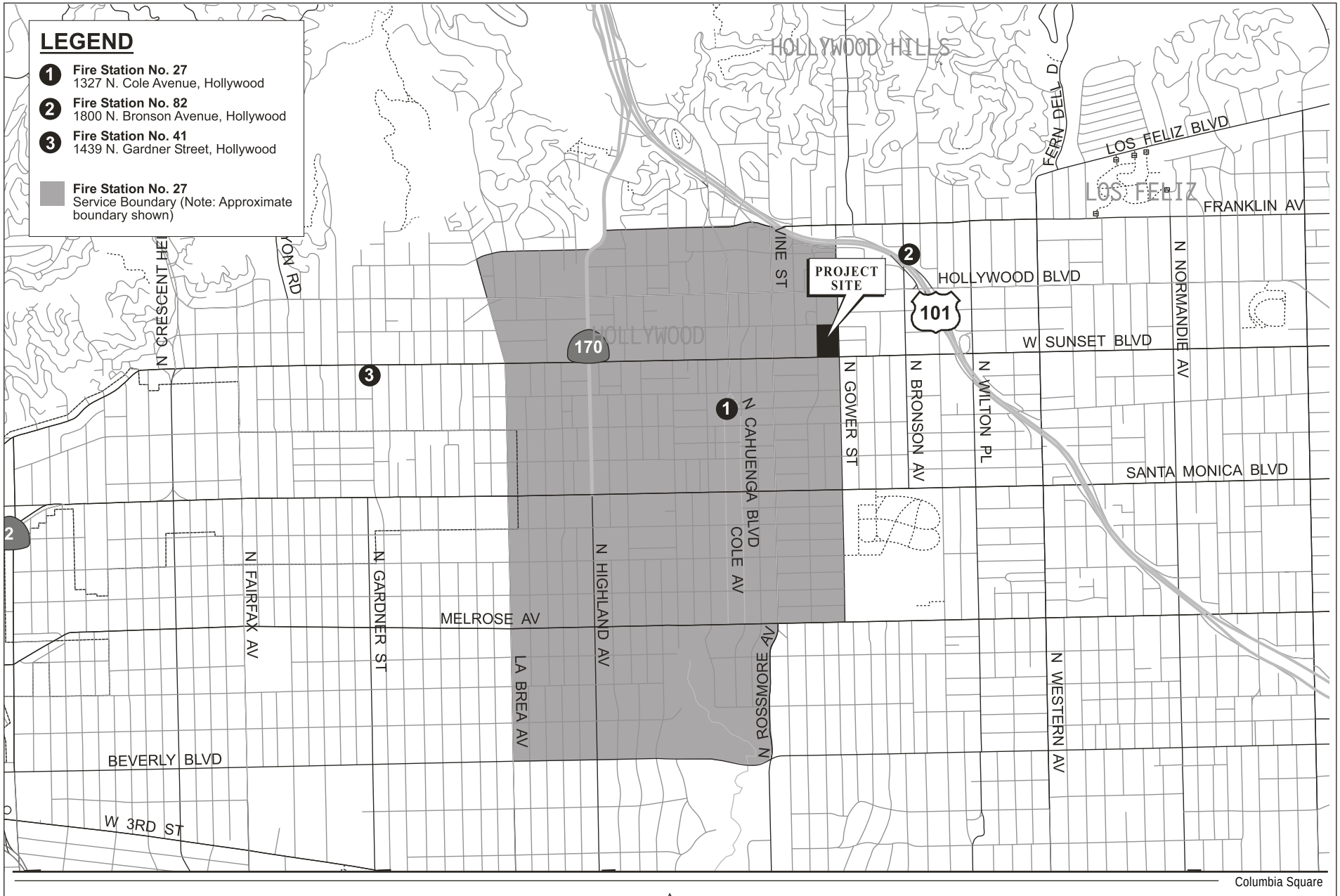
[4] *Ibid.*

[5] *Written communication with William N. Wells, Captain II-Paramedic of the Los Angeles Fire Department Planning Section, June 12, 2008.*

[6] *Ibid.*

[7] *Response distances provided by LAFD.*



matrix environmental

Figure IV.H-1
Fire Stations Located in the Project Vicinity

Source: Thomas Bros., 2003; Matrix Environmental, 2009

Table IV.H-1
Fire Stations Located In The Vicinity of The Project Site

Station No./Location	Distance From Project Site	Approximate Response Time to the Project Site	24-Hour Staffing	Equipment
Fire Station No. 27 1327 N. Cole Ave. Hollywood	0.55 mile	3.5 minutes	16	– Truck and Engine Company – Fire Engine – Paramedic Rescue Ambulance – Basic Life Support Rescue Ambulance – Battalion Command
Fire Station No. 82 1800 N. Bronson Ave. Hollywood	0.5 mile	3.4 minutes	6	– Fire Engine – Paramedic Rescue Ambulance
Fire Station No. 41 1439 N. Gardner St. Hollywood	1.75 miles	5.9 minutes	8	– Fire Engine – Paramedic Rescue Ambulance – Basic Life Support Rescue Ambulance

Source: Written communication with William N. Wells, Captain II-Paramedic of the Los Angeles Fire Department Planning Section, June 12, 2008.

two stations.[8] "First-in" districts are also based on the land use contained within the district, since the demand for services and response times can vary depending on population density, traffic, building types, and uses. Fire Station No. 27 would have an estimated response time of 3.5 minutes to the project site. The area served by Fire Station No. 27 had an estimated 2007 service population of 53,333 residents.[9]

[8] *The midway points are determined according to response times to specific "Z" points (points placed 500 feet apart on a grid).*

[9] *The area served by Fire Station No. 27 is irregular, but generally bordered by Cahuenga Pass on the north, Vine Street, Gower Street, Gordon Street, and Rossmore Avenue on the east, Beverly Boulevard on the south, and La Brea on the west. This area does not correspond with the Hollywood Community Plan Area and Fire Station boundaries do not completely overlap with the census tracts. Estimated 2007 population for the census tracts within the Fire Station No. 27 boundaries were obtained from the Los Angeles Department of City Planning Demographics Research Unit- Statistical Information Website and are as follows: Census Tract 191000 wherein the project site is located (3,231 residents), Census Tract 190100 (5,617 residents), Census Tract 190800 (6,602 residents), Census Tract 191820 (3,505 residents), Census Tract 190200 (6,787 residents), Census Tract 192300 (2,786 residents), Census Tract 190700 (4,402 residents), Census Tract 191900 (7,227 residents), Census Tract 191810 (4,427 residents), Census Tract 189600 (3,730 residents), Census Tract 190902(4,923 residents) = 53,333 residents.*

"Second call" stations that support Fire Station No. 27 during emergency incidents are Fire Stations No. 82 and No. 41. Fire Stations No. 82 and No. 41 would have estimated response times of 3.4 minutes and 5.9 minutes, respectively.[10]

The LAFD classifies responses either as emergency medical service (EMS) or fire. EMS responses are further classified into either Basic Life Support (BLS) or Advanced Life Support (ALS). BLS responses include the deployment of a truck, an ambulance, and services of an emergency response technician, but do not require the use of paramedics. ALS responses include the deployment of a truck, an ambulance, and a qualified (rated) paramedic. The paramedic rating is based on advanced technical training and hours of experience. Fire responses refer to fire calls including building fires, smoke, and traffic accidents not requiring emergency medical service, trash and vehicles fires, and response to fire alarms, elevator rescues, and similar emergencies. Table IV.H-2 presents the 2007 annual average number of responses and average response times for the three LAFD stations closest to the project site. As shown therein, Fire Station No. 27 had 13,768 total responses in 2007, consisting of 9,452 emergency medical service responses and 4,316 fire-related responses. For all three fire stations in the project area, there were a total of approximately 28,276 responses. BLS and ALS medical responses constitute approximately 75 percent of the total responses for the three fire stations.[11] Fire responses constitute approximately 25 percent of the total responses.

(1) Emergency Access

The project site is accessible to all emergency vehicles via Sunset Boulevard. Emergency access within the project site is currently provided via interior driveways and parking lot.

(2) Fire Flow

Water for firefighting purposes is supplied to the project site via existing City of Los Angeles Department of Water and Power (LADWP) water mains and fire hydrants located within adjacent streets. Currently, there are three 4-inch double fire hydrants located adjacent to the project site, along the eastern perimeter of the project site.[12] The first hydrant is located at the northeast corner of the site on Gower Street near Selma Avenue.

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10. *Written communication with William N. Wells, Captain II-Paramedic of the Los Angeles Fire Department Planning Section, June 12, 2008.*

11 *Ibid.*

12 *City of Los Angeles Bureau of Engineering, Navigate LA, http://navigatela.lacity.org/, accessed July 22, 2008.*

Table IV.H-2
2007 Responses Data for LAFD Stations Serving the Project Site

Fire Station	Annual Reponses	Average Response Time
Fire Station No. 27		
Emergency Medical Service Responses	9,452 (69%)	5.6 minutes [a]
Fire Responses	4,316 (31%)	4.6 minutes
Total Station Responses	13,768	
Fire Station No. 82 [b]		
Emergency Medical Service Responses	5,656 (82%)	5.2 minutes [a]
Fire Responses	1,220 (18%)	5.3 minutes
Total Station Responses	6,876	
Fire Station No. 41 [b]		
Emergency Medical Service Responses	6,068 (80%)	6.1 minutes [a]
Fire Responses	1,564 (20%)	5.6 minutes
Total Station Responses	7,632	
GRAND TOTAL	**28,276**	
Emergency Medical Service Responses	**21,176 (75%)**	
Fire Responses	**7,100 (25%)**	

[a] *Response times for emergency medical service responses (EMS) reflect ALS responses. Per communication with the LAFD, the LAFD does not benchmark or publish BLS response times as they are misleading since they include non-emergency responses without red lights and siren.*

[b] *Fire Stations No. 82 and No. 41 average response times also include emergency services to Hollywood Hills.*

Source: Fax and Email communication with William N. Wells, Captain II-Paramedic of the Los Angeles Fire Department Planning Section, June 12, 2008.

The second hydrant is also located on Gower Street, approximately mid-block between Selma Avenue and Sunset Boulevard. The third fire hydrant is located at the southeast corner of the site on Sunset Boulevard near Gower Street. The fire hydrants would be utilized during fire emergencies, as necessary. All hydrants have a 4-inch by 4-inch (4-inch double) outlets and conform to the minimum standards of the American Water Works Association for wet barrel hydrants in accordance with Division 9 of the Fire Code (Section 57.09.06).[13]

[13] *City of Los Angeles, Bureau of Engineering, Navigate LA, http://navigatela.lacity.org/index.cfm, accessed May 31, 2007.*

3.Project Impacts

a. Methodology

Fire service needs are dependent on the size of the population and the geographic area served, the number and types of calls for service, and the characteristics of the community and the proposed project.[14] The LAFD evaluates the demand for fire prevention and protection services on a project-by-project basis to review a project's emergency features and to determine if a proposed project would require additional equipment, personnel, or facilities. Beyond the standards included in the Los Angeles Fire Code, consideration is given to the size of a project, uses proposed, fire-flow necessary to accommodate the project, response time and distance for engine and truck companies, fire hydrant sizing and placement standards, access, and the project's potential to use or store hazardous materials.

b. Significance Thresholds

According to the *City of L.A. CEQA Thresholds Guide* (2006), the determination of significance for impacts associated with emergency preparedness shall be made on a case-by-case basis, considering the following factor:

- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences

In addition, based on the *City of L.A. CEQA Thresholds Guide (2006),* a significant impact to fire protection and emergency medical services would occur if the project would require the addition of a new fire station or the expansion, consolidation, or relocation of an existing station to maintain service.

c. Project Design Features

During project construction, construction managers and personnel would be trained in emergency response and fire safety operations. Fire suppression equipment specific to construction would be maintained on-site in accordance with OSHA and Fire Code requirements. Additionally, traffic management personnel (flag persons) and appropriate

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14. *City of L.A. CEQA Thresholds Guide, 2006.*

detour signage would be employed as necessary to ensure emergency access to the project site and traffic flow on street right-of-ways is maintained.

The project would also incorporate building design features that would comply with applicable LAMC fire safety requirements, including LAMC Chapter 9 (Building Code) and Chapter 7 (Fire Code). Fire safety design features would include and are not limited to the following: fire-resistant building materials, emergency and fire control elevator in each bank of elevators, a fire alarm system throughout the buildings, a standby emergency power system, smoke detection systems in all residential and public areas, fire safety signage on all floors, a separate Fire Control Station, automatic sprinkler systems, and a rooftop emergency helicopter landing facility for the residential and office high-rise buildings. Further, a plot plan would be submitted to LAFD for approval prior to the recordation of the final map or the approval of a building permit. The plot plan would include the following minimum design features:

- No building or portion of a building would be constructed more than 150 feet from the edge of a roadway, of an improved street, access road, or designated fire lane, unless otherwise approved;
- Access for LAFD apparatus and personnel to and into all structure structures would be provided;
- Locations and sizes of all fire hydrants; and
- All structures would be within 300 feet of an approved fire hydrant.

d. Analysis of Project Impacts

(1) Construction

Construction activities may temporarily increase the existing demand on fire protection and emergency medical services. Construction activities could potentially expose combustible materials such as wood, plastics, sawdust, coverings and coatings to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Project construction would also comply with applicable codes and ordinances relating to fire safety

practices. Therefore, construction impacts on fire protection and emergency medical services would be less than significant.

Short-term construction activities such as lane closures, sidewalk closures, and utility line construction could have implications related to response time for emergency vehicles due to access obstruction. Construction activities would also generate traffic associated with the movement of construction equipment, hauling of demolition and graded materials, and employee traffic. As such, construction activities could increase response time for emergency vehicles on Sunset Boulevard due to travel time delays caused by traffic. However, during construction, traffic management personnel (flag persons) would be employed as necessary to ensure access is maintained to the project site and that traffic flow is maintained on street right-of-ways. Furthermore, appropriate detour signage would be employed as necessary to ensure emergency access is maintained to the project site and that traffic flow is maintained on street right-of-ways. Since emergency access to the site would remain clear and unobstructed during construction of the project, impacts related to LAFD emergency access would be less than significant.

(2) Operation

(a) Capability of Existing Fire Services

As previously discussed, the project site is located within the "first-in" district boundaries of Fire Station No. 27. Fire Station No. 27 is equipped with a truck and engine company, fire engine, paramedic rescue ambulance, and a basic life support rescue ambulance. Based on the City's 2007 population estimate, the fire district served by Fire Station No. 27 has a population of 53,333 residents. As previously discussed, in 2007, Fire Station No. 27 had 13,768 responses, including 9,452 EMS responses and 4,316 fire responses. By dividing the 2007 annual number of responses by the 2007 estimated population of the district, a generation factor of 0.26 annual responses per capita was derived. As analyzed in Section IV.K, Population, Housing, and Employment of this Draft EIR, the project would generate approximately 908 new residents. Based on the generation factor of 0.26 responses per capita for Fire Station No. 27, the residential component of the project would generate approximately 236 additional responses per year. The 236 additional responses per year would increase the total annual response by 1.70 percent. The commercial components of the project also would result in approximately 1,727 employees on the site. Furthermore, in addition to the permanent increase in residents and employees attributable to the project, development would result in an increase in visitors associated with the hotel and commercial uses at the site. This temporary daytime population could also generate responses. Thus, project implementation could increase the demand on LAFD services. However, Fire Station No. 27 is located just over one-half mile from the project site, which is within the recommended maximum response distance (1.5 miles), and has an estimated response time of 3.5 minutes to the project site. Therefore, impacts relative to the

LAFD's capability to provide adequate fire protection services would be less than significant. In addition, Fire Station No. 82 and 42 would also be available to serve the project site in event of emergencies. Furthermore, the project would submit a plot plan for approval by the LAFD either prior to the recordation of the final map or the approval of a building permit. To ensure that such impacts would remain less than significant, mitigation measures are proposed.

(b) Fire Safety, Access, and Fire Flow Requirements

A project's impact on fire services is determined in part by its compliance with the applicable provisions of the Fire Code and the Building Code. A project that closely complies with the applicable provisions is less likely to cause any significant impacts to fire services. As discussed above, the project is located within the service boundaries of Fire Station No. 27.

(i) Fire Response Distance

Per Section 57.09.07 of the Fire Code, the maximum response distance from a commercial development to a fire station with an engine company is one mile and to a fire station with a truck company is 1.5 miles. Fire Station No. 27, located 0.55 mile from the project site, would be within the Fire Code's maximum response distance of one mile from a fire station with an engine company and within LAFD's maximum response distance of 1.5 miles from a fire station with a truck company . In addition, based on correspondence with the LAFD, the estimated response time to the project site is approximately 3.5 minutes, which is less than the station's average response times for all incident types.[15] As such, impacts with regard to fire response distance would be less than significant.

(ii) Fire Flow

Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. In accordance with Division 9 (Section 57.09.06) of the Fire Code, a minimum of a minimum of 6,000 to 9,000 gpm flowing from four to six hydrants simultaneously would be required to serve the mix residential and commercial uses of the project. Based on consultation with the LAFD Hydrant and Access Unit, a minimum fire flow of 4,500 gpm from three hydrants flowing simultaneously would be required for the project. As previously stated above, three fire hydrants are located adjacent to the project site and would be utilized by fire fighters during fire emergencies.

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[15] *Written communication with William N. Wells, Captain II-Paramedic of the Los Angeles Fire Department Planning Section, May 21, 2007.*

According to the fire service pressure flow reports conducted by LADWP in October 2008, the installation of a new 10-inch connection to an existing 8-inch water main in Sunset Boulevard would provide a domestic flow of 2,500 gpm with a fire flow of 5,000 gpm with a residual pressure of 48 psi. The placement of a new 8-inch connection to an existing 8-inch in Gower Avenue, would provide a domestic flow 1,500 gpm with a fire flow of 2,500 gpm with a residual pressure of 60 psi. Additionally, a new 8-in connection to the 8-inch water main in El Centro Avenue and a new 8-inch connection to the existing 8-inch water main in Selma Avenue would provide domestic flows of 1,500 gpm with fire flows of 2,500 gpm with a residual pressure of 65 and 61 psi, respectively.[16] . Thus, based on the adequate residual pressures of these existing water mains, the existing water infrastructure would be adequate to meet the fire flow requirements.[17]

Furthermore, if additional off-site private fire hydrants are required to meet fire flow requirements, the number, sizes, and locations of such hydrants would be determined after LAFD's review of the plot plan. Hydrants would be installed prior to building construction. The plot plan, showing hydrants and access, would be prepared and submitted for approval by the LAFD either prior to the recordation of the final map or the approval of a building permit. Based on the above, the project would result in a less than significant impact relative to fire flows.

(iii) Fire Safety Design and Firefighting Access

The project would comply with the all fire safety elements related to the high-rise design and construction requirements set forth in the LAMC, including Chapter 9 (Building Code) and Chapter 7 (Fire Code).

Division 118 of the Fire Code classifies buildings where the highest floor level is more than 75 feet above the lowest point of fire access as high-rises. Buildings classified as high-rise are subject to specific requirements for fire safety, including the provision of a rooftop helipad. The project would include the development of buildings with the highest floor levels more than 75 feet above the lowest point of fire access. Specifically, the residential tower would reach a building height of approximately 447 feet with other elements, such as the helipad extending to a maximum of 487 feet and architectural features extending to approximately 512 feet. Additionally, the office tower would be approximately 204 feet tall with other elements such as the helipad extending to approximately 224 feet and architectural features extending to approximately 260 feet. In compliance with Division 118, the project would provide at least one emergency and fire

[16] *Los Angeles Department of Water and Power, Fire Service Pressure Flow Reports, SAR 14907-14910, October 2008.*

[17] *Email communication, Alex Moore of Hall & Foreman, Inc. October 20, 2008.*

control elevator in each bank of elevators, a fire alarm throughout the building, a standby and emergency power system, stairshaft doors for fire department use, pressurized stairshafts, and other devices operable from the Control Station, as previously listed. Smoke detectors would also be maintained in all residential units and public areas. Stairways would be numbered on each floor, and fire safety signage on all floors would be placed in required locations. The project would also include a minimum, separate 100-square-foot Fire Control Station in the residential buildings, located near or adjacent to the main entrances of the buildings. The Fire Control Station would contain all of the code-required fire safety equipment, including a public address system, telephones, fire detection and alarm controls, elevator recall and status panel, automatic sprinkler system, sprinkler controls, standby power and emergency electrical power systems controls, controls for an air handling system (smoke evacuation), stairway pressurization system control switches, and other systems as required by Division 118 of the Fire Code. The project would also include automatic sprinkler systems, and a rooftop emergency helicopter landing facilities located on the rooftops of the high rise residential and office buildings. In case of fire emergencies, access to the roof would also be available. Fire safety information would be distributed to all building tenants.

Consistent with Fire Code Division 119, the project would undergo an annual inspection including the evaluation of physical access, property condition, and all fire-safety facilities and equipment required under the LAMC Fire and Building Codes. In regard to Division 7 of the Building Code, the project would comply with all fire safety requirements related to provision of fire-resistant building materials and smoke control.

As discussed above, the project Applicant would submit a plot plan for approval by the LAFD either prior to the recordation of the final map or the approval of a building permit. Based on the above, the project would comply with applicable Fire and Building Codes and LAFD requirements and would have a less than significant impact relative to fire safety design, access, and fire flow. Nonetheless, mitigation measures are proposed below to ensure compliance with Fire Code and LAFD requirements.

4. Cumulative Impacts

The fire district boundary for Fire Station No. 27 is irregular, but generally bordered by Cahuenga Pass on the north, Vine Street, Gower Street, Gordon Street, and Rossmore Avenue on the east, Beverly Boulevard on the south, and La Brea on the west. Of the 94 related projects listed in Section III of this EIR, 32 are located within the “first-in” fire district boundaries of Fire Station No. 27 and are summarized in Table IV.H-3 on page IV.H-17. These related projects include various residential, commercial/retail, and office uses. These related projects, in conjunction with the project, would cumulatively generate the need for additional fire protection and emergency medical services. Because the

Table IV.H-3
Related Projects Within Fire Station No. 27 Service Area

Related Project No.	Project	Residential	Restaurant/ Bar	Retail and Services	Office	Hotel	Other	Gas Station
5	Gas station w/mini-mart							8
6	Cocktail lounge		11,884					
9	Apartments & retail	54		16,000				
19	Condos	54						
21	Condos	218						
25	Quality Restaurant & Jazz Club		6,321					
27	Condos	218						
29	Rite-Aid w/ drive-thru			16,000				
40	Office Building				120,000			
47	Sunset & Vine Mixed-Use	306		68,000				
50	Restaurant		13,132					
51	Apts & retail (1/2 of blk Yucca & Highland & McCadden)	270		8,500				
54	Restaurant (w/ gourmet shop)		15,161					
55	Rest. & multi-purpose entertainment venue		13,000					
58	Retail & office bldg			29,900	16,700			
62	Mixed-use residential, retail and restaurant	787	9,500	12,700				
66	Hotel					50		
67	Office				240,000			
68	Mixed-use residential and retail	374		15,000				
73	Quality restaurant		8,100					
75	Restaurant/Club		6,246			100		
76	Selma & Vine Office Building		5,871		102,311			
78	Hollywood Production Center	57						
79	Pharmacy/Drug Store			13,387				
80	Palladium Renovation			10,000				
81	Madame Tussaud's Wax Museum			1,405			42,689	
83	Highland Center Mixed-Use Project	496		45,400	186,200	300		
86	Academy Museum of Motion Pictures						300,000	
87	ASC Screening Room						25,573	
88	Condominiums	96						
91	Retail (CIM/EISEN project)			60,200				

Table IV.H-3 (Continued)
Related Projects Within Fire Station No. 27 Service Area

Related Project No.	Project	Residential	Restaurant/ Bar	Retail and Services	Office	Hotel	Other	Gas Station
93	Palladium	170	12700		237,000	251		
	Related Project Total[c]	**3,100 du**	**101,915 sf**	**296,492 sf**	**902,211 sf**	**701 rms**	**368,262 sf**	**8 vfp**

	Total Residential Population	Total Responses for Residential
Related Projects Total	7,037	1,830
Project Total	908	236
CUMULATIVE TOTAL	**7,945**	**2,066**
Total % of Fire Station No. 27 annual responses		15%

[a] *Corresponds with Map Nos. on Figure III-1 in Section III of this EIR.*
[b] *The same methodology used to determine the approximate number of incidents generated by the project was utilized to estimate the approximate number of incidents for related projects. For related projects with residential uses, the residential population was determined by multiplying the number of residential units by the average household size of 2.27 persons per unit for owner-occupied housing within the Hollywood Community Plan Area. This number was then multiplied by the generation factor of 0.26incidents per capita. The number is rounded to nearest whole number.*
[c] *du = dwelling units; sf = square feet; rms = rooms; vfp = vehicle fuel pump*

Source: Matrix Environmental, 2009.

generation factor used to determine the number of annual responses is based on residential population within service area of Fire Station No. 27, the estimated number of responses that could potentially be generated by related projects is only calculated for those projects with proposed residential uses. As shown in Table IV.H-3, based on the generation factor of 0.26 responses per capita, the related projects could potentially generate 1,830 additional responses per year. Thus, the project in conjunction with the related projects would generate approximately 2,066 additional responses per year. This represents a 15 percent increase in annual responses for Fire Station 27's service area. In addition, the related projects would also have an increase of commercial/retail and office uses, Code regulations related to fire safety, access, and fire flow. In addition, it is anticipated that related projects would be subject to discretionary review by the LAFD and would be required to implement mitigation measures to ensure that no significant impacts to fire protection services would occur. Furthermore, other nearby fire stations, including Fire Stations No. 82 and No. 41 would be available to provide backup support to Fire Station No. 27 if necessary in the event of an emergency. Therefore, the project combined with related projects would result in a less than significant cumulative impact relative to fire protection and EMS services.

5. Mitigation Measures

Although impacts would be less than significant, the following mitigation measures would ensure compliance with the City's Fire Code and LAFD requirements.

Mitigation Measure H-1: The Project Applicant shall submit building plans including a plot plan for approval by the Los Angeles Fire Department prior to the recordation of the final map.

Mitigation Measure H-2: The Project Applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features appropriate to the design of the project.

6. Level of Significance After Mitigation

The project would not result in significant impacts on fire protection and emergency medical services. Implementation of the proposed mitigation measures would ensure compliance with Fire Code and LAFD requirements. Thus, no significant impacts are anticipated with respect to fire services.

1. Introduction

This section describes the existing police services for the surrounding project area and analyzes the potential impacts related to these services that would occur as a result of the project. The focus of the analysis is on the Los Angeles Police Department (LAPD) facilities and staff that currently serve the project site and the ability of the LAPD to provide adequate police services for the project. This section is based on information provided by the LAPD's Community Relations Section, Crime Prevention Unit, which is provided in Appendix H of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework, adopted in December 1996 and again in August 2001, sets forth general guidance regarding long-term growth issues for the entire City of Los Angeles and defines Citywide policies regarding land use, infrastructure, and public services. Goal 9I of the Infrastructure and Public Services Chapter of the Citywide General Plan Framework is to ensure that every neighborhood is entitled to have the necessary level of police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.[18] Objective 9.13 and Policy 9.13.1 requires the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel are available to meet existing and future public needs. Additionally, Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining relationships with local law enforcement agencies, State law enforcement agencies, and the National Guard.

[18] *City of Los Angeles General Plan Framework, page 9-5.*

Presently, the LAPD Computer Statistics Unit (COMPSTAT) implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. COMPSTAT was created in 1994 by then Police Commissioner of the New York Police Department and current Chief of the Los Angeles Police Department, William J. Bratton. This system implements a multilayer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. As such, COMPSTAT has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.[19]

(2) City of Los Angeles Charter and Administrative and Municipal Codes

The law enforcement regulations and the powers and duties of the LAPD are outlined in the City of Los Angeles Charter Article V, Section 570; the City of Los Angeles Administrative Code Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC) Chapter 5 (Public Safety and Protection), Article 2 (Police and Special Officers).

City of Los Angeles Charter Article V, Section 570 gives power and duty to the Police Department to enforce the penal provisions of the Charter, City ordinances and state and federal law. The charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity. Chapter 11, Section 22.240 of the Los Angeles Administrative Code requires the LAPD to adhere to the State of California standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter 5 regulations related to fire arms, illegal hazardous waste disposal, and nuisances, such as excessive noise, and providing support to the Department of Building and Safety Code Enforcement inspectors and the Fire Department in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is given the power and the duty to protect residents and property, and to review and enforce specific security related mitigation measures in regards to new development.

b. Existing Conditions

The LAPD currently comprises 19 community police areas operated by four geographically located bureaus: the Central, South, West, and Valley Bureaus. The

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[19] *LAPD "COMPSTAT." http://www.lapdonline.org/search_results/content_basic_view/6363 (accessed August 26, 2008).*

project site is located in the West Bureau's Hollywood Area, which covers 17.51 square miles and is served by the Hollywood Community Police Station located at 1358 North Wilcox Avenue (approximately 0.64 miles northeast of the project site). The service boundaries of the Hollywood Community Police Station include Mulholland Drive and the Los Angeles City boundary to the north; Normandie Avenue, Ferndell Drive, and Griffith Park to the east; the Los Angeles City boundary and Beverly Boulevard to the south; and the Los Angeles City boundary to the west. The Hollywood Community Police Station provides police protection service to a residential population of approximately 230,383 people within the service area.[20] In the event additional staffing is required, additional officers can be called in from other LAPD areas.

The Hollywood Area is further divided into several reporting districts. The project site is located within Reporting District (RD) 647, which extends to Hollywood Boulevard to the north, the Hollywood Freeway (US-101 Freeway) to the east, Sunset Boulevard to the south, and Vine Avenue to the west. Figure IV.H-2 on page IV.H-23 illustrates the service boundaries of the Hollywood area in regards to the project site.

Table IV.H-4 on page IV.H-24, provides statistics for the Hollywood area and Citywide service areas with regards to residential population, sworn personnel, crime rate, officers per residents, and emergency call average response time for 2007. As shown in Table IV.H-4, the Hollywood area/Hollywood Community Police Station had 330 sworn officers and 24 civilian support staff. Based on this station's 2007 residential service population of 230,383, the ratio of officer per resident was approximately one officer per 698 residents. In comparison, the Citywide ratio was approximately one officer per 452 residents. The 2007 average response time to emergency calls for the Hollywood Area was approximately 5.8 minutes, which is favorably shorter than the Citywide response time of approximately 6.9 minutes.

Table IV.H-5 on page IV.H-24 summarizes the 2007 crime statistics for RD 647, the Hollywood area, and the City. As shown in Table IV.H-5, there were approximately 33 crimes per 1,000 residents in the Hollywood Area and 30 crimes per 1,000 residents Citywide. The most common type of crime in RD 647, the Hollywood Area, and Citywide was theft, which constituted almost 50 percent of the total crimes reported.

[20] *Captain Paul A. Snell, Executive Commanding Officer, Office of the Chief of Police, LAPD, letter correspondence dated October 23, 2008.*

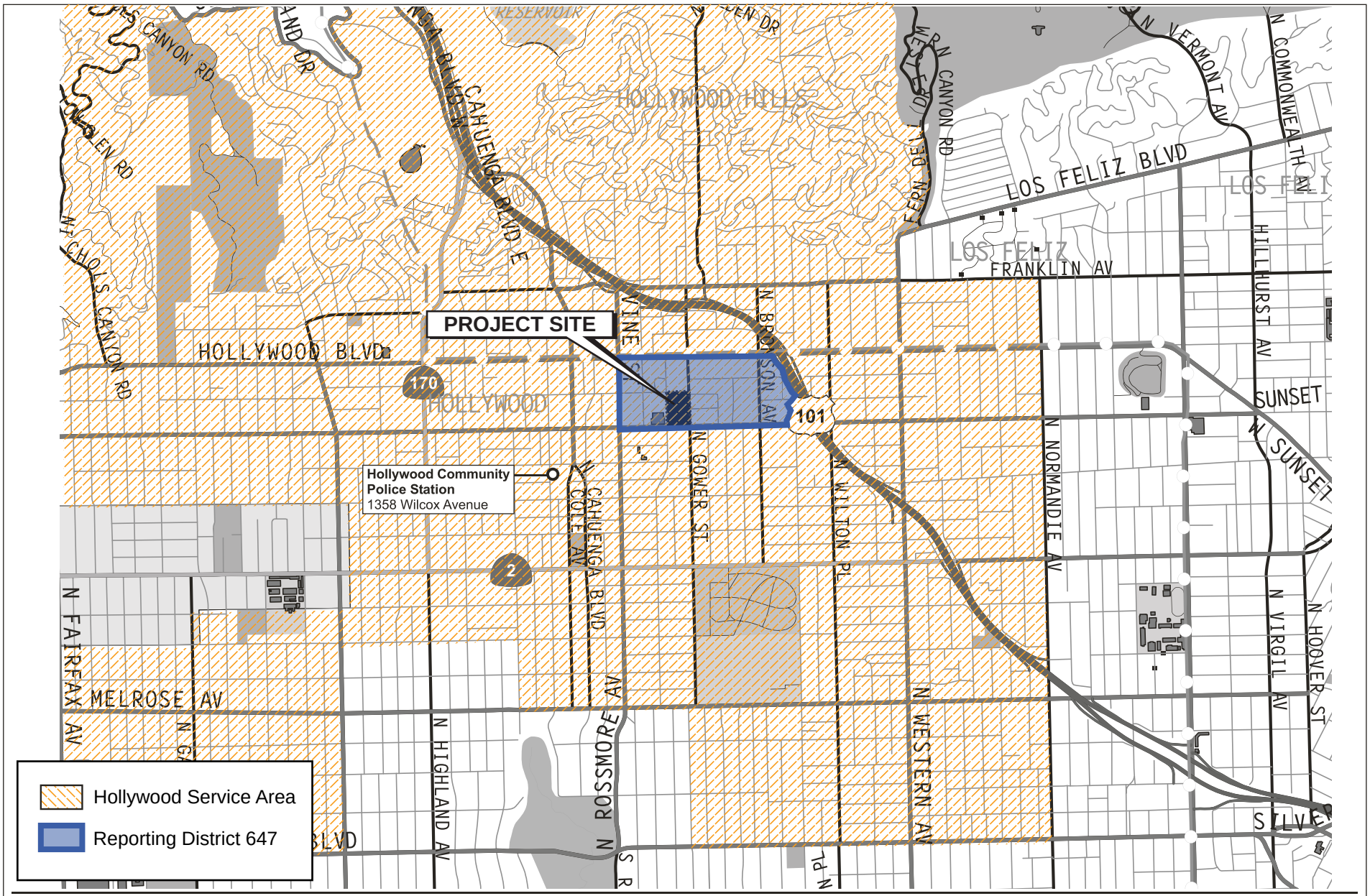

Figure IV.H-2
Hollywood Community
Police Station Service Area

Source: Los Angeles Police Dept., 2008

Table IV.H-4
Population, Officer, Crime, and Response Time Comparison for 2007 [a]

Service Area	Square Miles	Population	Sworn Officers	Officer/Resident Ratio	Annual Crimes	Average Response Time
Hollywood Area	17.51	230,383	330 [b]	1:698	7,601	5.8 minutes
Citywide	472.67	4,346,867	9,608[c]	1:452	130,585	6.9 minutes

[a] *Statistical information is based on 2007 LAPD Selected Crimes and Attempts by Reporting District from the Police Arrest and Crime Management Information System 2 reports.*
[b] *This does not include the 24 civilian support staff of the Hollywood Community Police Station.*
[c] *LAPD Website, Citywide Crime Statistics, http://www.lapdonline.org/assets/pdf/2007%20summary.pdf , accessed October 29, 2008.*

Source: Captain Paul A. Snell, Executive Commanding Officer, Office of the Chief of Police, LAPD, letter correspondence dated October 23, 2008.

Table IV.H-5
Crime Statistics by Reporting District of Occurrence

	RD 647		Hollywood		Citywide	
Crime	**Number**	**Percent[e]**	**Number**	**Percent[e]**	**Number**	**Percent[e]**
Burglary [a]	61	24%	2,408	32%	40,728	31%
Robbery [b]	26	10%	926	12%	13,479	10%
Murder	1	0%	18	0%	394	0%
Rape	5	2%	56	1%	997	1%
Aggravated Assault	27	11%	713	9%	12,960	10%
Theft [c]	130	52%	3,468	46%	61,678	47%
Bunco [d]	1	0%	12	0%	349	0%
Total	**251**	**100%**	**7,601**	**100%**	**130,585**	**100%**
Crimes per 1,000 Population [e]	N/A		33		30	

[a] *Includes burglaries from businesses, residents, vehicles, and other.*
[b] *Includes street and other robberies.*
[c] *Includes theft from vehicles and persons, as well as grand theft, purse snatching, bike theft, vehicle theft, and other.*
[d] *Includes forgery and extortion.*
[e] *Totals rounded to the nearest whole number, therefore, values may not add to exactly 100 percent.*

Source: Captain Paul A. Snell, Executive Commanding Officer, Office of the Chief of Police, LAPD, letter correspondence dated October 23, 2008.

3. Project Impacts

a. Methodology

The determination of significance relative to impacts on police services is based on evaluation of the LAPD's ability to provide adequate police services to serve the existing and future population. The analysis is focused on the Hollywood Community Police Station, as this is the station that would serve the project. The analysis presents statistical averages for the Hollywood Community Police Station and the City.. Data includes the ratios of residents per officer and the number of major crimes and arrests for the police station and the City, as provided by the LAPD. Per the *City of L.A. CEQA Thresholds Guide (2006),* potential impacts to police services of the Hollywood Community Police Station are assessed using the following two analyses: (1) evaluation of the ability of the Hollywood Community Police Station to meet demand for police services anticipated at the time of project buildout compared to the expected level of service available, and (2) evaluation of the project's proposed security and/or design features that might alleviate the project's demands on the LAPD.

To evaluate the ability of the Hollywood Community Police Station to meet the demands on police services anticipated at the time of project buildout, the expected number of annual crimes generated by the residential component of the project was estimated using the following method: (1) a per capita rate of annual crimes in the Hollywood area was determined by dividing the total number of crimes in the Hollywood area in 2007 by the residential population of the Hollywood area for the same year; and (2) by multiplying this per capita rate by the project's estimated residential population at buildout to calculate the approximate number of crimes that could potentially be generated by the project's residential component. The resident to officer ratio was also assessed to determine the ability of the Hollywood Community Police Station to serve the project site and anticipated project-generated increase in crime number. The analysis also identified the project's proposed security and/or design features and evaluated their ability to reduce demand on police services.

b. Significance Thresholds

Based on the *City of L.A. CEQA Thresholds Guide (2006)*, a significant impact to police protection services is determined on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area.

- The demand for police services anticipated at the time of project build out compared to the expected level of service available. Consider as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand.

- Whether the project includes security and/or design features that would reduce the demand for police services.

c. Project Design Features

The project would incorporate various elements to promote individual and community safety. During construction, the project site would be fenced to prevent public entry and theft. Furthermore, a Construction Staging and Traffic Management Plan would be implemented and project contractors would coordinate with the LAPD to ensure emergency response access to the project site is maintained.

During operation, the project would incorporate state-of-the-art security features to provide for the safety of on-site residents, employees, and visitors. These features would include the provision of on-site security guards, controlled parking and building access, and closed circuit television (CCTV) cameras to monitor the open space, parking structure, building entrances, elevators, loading dock, and perimeter areas around the building and parking structure. It is anticipated that both the residential building and the office building would include a security console in the lobby where security guards would monitor the CCTV cameras, control access to the building, and coordinate with other on-site security, as needed. Security personnel would patrol the parking structure and exterior areas on a regular basis. A minimum of two security personnel would be on duty twenty-four hours a day, seven days a week. Initial alarms, such as intruder alarms or duress alarms would be responded to by on-site security. Site security would call the Los Angeles Police Department as necessary.

d. Analysis of Project Impacts

(1) Construction

Short-term construction activities, including but not limited to lane closures, sidewalk closures, and utility line construction, could potentially affect emergency police access to the project site. Construction activities would also generate traffic associated with the movement of construction equipment, hauling of demolition and graded materials, and employee traffic. However, traffic management personnel (flag persons) would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate detour signage would also be

used as necessary to ensure emergency access would be maintained to the project site and that traffic flow would be maintained on street right-of-ways. In addition, the LAPD would be notified of the days, times, and locations of any lane closures. As construction traffic could significantly impact emergency response times for the area, a Construction Staging and Traffic Management Plan would be implemented with coordination between the project's construction managers and the LAPD (refer to Mitigation Measure I-1 in Section IV.I, Transportation and Circulation, of this EIR). Therefore, with the implementation of the Construction Staging and Traffic Management Plan and coordination with the LAPD, potential project impacts due to construction activities would be reduced to a less than significant level.

(2) Operation

As analyzed in Section IV.K, Population, Housing, and Employment of this Draft EIR, the project would generate a residential population of approximately 908 residents. In addition, the non-residential components, which consist of a hotel, office space, restaurant, and retail, would generate a daytime population of approximately 1,831 persons, as shown in Table IV.H-6 on page IV.H-28.[21] As discussed above, the project would be served by the Hollywood Community Police Station, which has approximately 330 sworn officers and a service population of approximately 230,383 residents.

Data on the number of annual crimes and the residential population of the Hollywood area for 2007 indicate that the Hollywood area had a crime rate of approximately 33 crimes per 1,000 residents or 0.033 crimes per capita. Assuming that the annual crime rate would remain constant at 0.033 crimes per capita, the residential population of the project (908 residents) would potentially generate approximately 30 crimes per year, as shown in Table IV.H-6. In addition, the project's commercial uses would generate a non-residential population of 1,831 persons, which would also potentially generate crimes. However, no crime rate for non-residential uses is available; therefore, crimes associated with the project's commercial uses could not be quantified.

As the project would generate approximately 908 new residents, the residential population for the Hollywood Community Police Station's service area would increase to a total of approximately 231,291 residents, as shown in Table IV.H-7 on page IV.H-28. Based on this new population, the officer per resident ratio in the Hollywood Community

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[21] *The non-residential population was determined based on the following generation factors as indicated in the L.A. CEQA Thresholds Guide (2006), Section K.1 Police Protection: 4 persons per 1,000 sq. ft. of office space, 3 persons per 1,000 sq. ft. of retail space, and 1.5 persons per hotel room. Actual non-residential population will fluctuate depending on time of year (e.g., tourist season).*

Table IV.H-6
Estimated Population and Crime Rate Associated with the Project

Proposed Land Use	Development Proposed	Police Service Population Generation Factor[a]	Residential/ Non-Residential Population	Crime Generation Factor (per capita)	Anticipated No. of Crimes per Year
Residential	400 du	2.27 residents/unit[b]	**908**	**0.033**	**30**
Non-Residential					
Retail/restaurant	41,300 sf	3 persons/1,000 sq. ft.	124	N/A	-
Hotel	125 rooms	1.5 persons/room	188	N/A	-
Office	380,000 sf	4 persons/1,000 sq. ft.	1,520	N/A	-
		Total Non-Residential Population	**1,831**		

[a] *Generation factors based on police service population conversion factors contained in the City of L.A. CEQA Thresholds Guide (2006), Section K.1, Police Protection, except as noted below. Actual non-residential population will fluctuate depending on time of year (e.g., tourist season).*
[b] *Based on the household size of 2.27 residents per unit for the Hollywood Community Plan area.*

Source: Matrix Environmental, 2009.

Table IV.H-7
Estimated Officer to Resident Ratios for the Hollywood Area

2007 Population	No. of Officers in 2007	Estimated 2007 Officer to Resident Ratio	Estimated Project Residential Population at Buildout	Estimated Residential Population with Project	Projected Officer to Resident Ratio at Buildout
230,383	330	1 per 698	908	231,291	1 per 701

Source: Matrix Environmental, 2009.

Police Station service area would be reduced from1 officer per 698 residents to 1 officer per 701 residents. This change in the resident per officer, which is less than one percent, would not be significant.

In a correspondence letter dated October 23, 2008, the LAPD indicated that the project's size could have a significant impact on police services, and therefore, recommended that crime prevention features be incorporated as part of the project.[22] As previously discussed, the project would include proposed security features (i.e., provision

[22] *Captain Paul A. Snell, Executive Commanding Officer, Office of the Chief of Police, LAPD, letter correspondence dated October 23, 2008.*

of on-site security guards, controlled parking and building access, and closed circuit television (CCTV) cameras). With these security features, the project's demand for police services would not noticeably affect the ability of the LAPD to provide adequate police services. Furthermore, a follow-up consultation was held with the LAPD on March 5, 2009 to review the project and the proposed security features. Per the LAPD, the design and character of the project, as well as the proposed security features, would serve to mitigate potential significant impacts on LAPD services.[23] Thus, the project's impacts on police services would be less than significant.

Regarding emergency access to the project site, Section IV.I, Transportation and Circulation, of this EIR demonstrates that project development would result in a less than significant impact on access. Although additional traffic generated by the project could potentially cause delays in LAPD emergency response times, the additional traffic would not significantly impact emergency vehicle access or response times.

4. Cumulative Impacts

Of the 94 related projects identified in Section III of this EIR, all of the projects are located within the Hollywood Area boundaries with the exception of Related Project No. 3. Related projects in the Hollywood Area would cumulatively generate, in conjunction with the project, the need for additional police protection services. The related projects include various residential, educational, commercial/retail, and office uses. Similar to the project, the number of annual crimes anticipated to be generated by related projects was estimated based on residential increases in population. Based on the conservative average household size of 2.27 persons per unit within the Hollywood Community Plan Area), the related projects would generate a residential population of 17,373 people. As shown in Table IV.H-8 on page IV.H-30, based on the crime generation factor of 0.033 crimes per capita, the related projects could potentially generate 570 additional crimes per year. To provide a conservative analysis, existing uses that would be demolished as part of related projects were not discounted. Therefore, the estimated 570 crimes associated with the residential uses presented in Table IV.H-8 is conservative. In addition, based on the non-residential population generation factors indicated in the *City of L.A. CEQA Thresholds Guide (2006)*, related projects could generate a daytime non-residential population of 16,608. However, as noted above, no crime rate for non-residential uses is available; therefore, crimes associated with the related projects' commercial uses were not quantified.

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[23] *Consultation with Captain Beatrice Girmala, Commanding Officer, Los Angeles Police Department, Hollywood Area, March 5, 2009.*

Table IV.H-8
Related Projects Within the Hollywood Community Police Station Service Area

Related Project No.[a]	Project	Address	Number of Units	Residential Population[b]	Total Daytime Population[c]	Estimated No. of Crimes[d]
3	Fast food restaurant with drive thru & specialty retail	5777 Hollywood Bl	0	0	26	0
4	Hotel & specialty retail	6107 Hollywood Bl	0	0	144	0
5	Gas station w/mini-mart[e]	1934 Cahuenga Bl	0	0	0	0
6	Cocktail lounge	1600 Vine St	0	0	36	0
7	Sunset Legacy Lofts	7950 Sunset Bl	183	415	39	14
13	Fairfax Av Mixed-Use	801 Fairfax Av	93	211	48	7
14	Apartments	5165 Fountain Av	110	250	0	8
15	Apartments & retail	922 Western Av	63	143	41	5
16	Apartments	6142 Franklin Av	130	295	0	10
19	Condos	6735 Yucca St	54	123	0	4
21	Condos	1714 Mc Cadden Pl	218	495	0	16
24	Mixed-Use	1611 La Brea Av	180	409	41	3
25	Quality Restaurant & Jazz Club	6531 Hollywood Bl	0	0	19	0
26	Hollywood/Garfield Mixed Use	5555 Hollywood Bl	108	245	30	8
27	Condos	1736 Mc Cadden Pl	218	495	0	16
28	Mixed-Use	5400 Hollywood Bl	42	95	20	3
29	Rite-Aid w/ drive-thru	6726 Sunset Bl	0	0	48	0
30	LAUSD - Cen Reg Mid School #5[e]	Fountain Av	0	0	0	0
31	Mixed-Use	1717 Vine St	57	129	16	4
36	Hollywood & Vine Mixed-Use	6250 Hollywood Blvd	525	1,192	635	39
37	Mixed-use	5651 Santa Monica Bl	437	992	1,134	33
38	Gas station[e]	5420 Sunset Bl	0	0	0	0
39	Runyon Canyon Park-Parking Lot[e]	2000 Fuller Av	0	0	0	0
40	Office Building	6040 Sunset Bl	0	0	480	0
41	BLVD 6200 (south) - mixed-use	6200 Hollywood Bl	952	2,161	572	71
45	KTLA office/studio expansion	5800 Sunset Bl	0	0	3,212	0
46	Sunset & Gordon Mixed-use (Old Spaghetti Factory)	5935 Sunset Bl	144	327	31	11
47	Sunset & Vine Mixed-Use	1538 Vine St	306	695	204	23
49	Argyle Lofts	1800 Argyle Av	73	166	92	5
50	Restaurant	6757 Hollywood Bl	0	0	39	0
51	Apts & retail (1/2 of blk Yucca & Highland & McCadden)	6758 Yucca St	270	613	26	20
54	Restaurant (w/ gourmet shop)	6523 Hollywood Bl	0	0	45	0
55	Rest. & multi-purpose entertainment venue	6506 Hollywood Bl	0	0	39	0

Table IV.H-8 (Continued)
Related Projects Within the Hollywood Community Police Station Service Area

Related Project No.[a]	Project	Address	Number of Units	Residential Population[b]	Total Daytime Population[c]	Estimated No. of Crimes[d]
56	Condos & retail	5663 Melrose Av	96	218	10	7
58	Retail & office bldg	6904 Hollywood Bl	0	0	157	0
60	Residential Development	6001 Carlton Way	42	95	0	3
61	Temple Israel of Hollywood expansion[e]	7300 Hollywood Blvd	0	0	9	0
62	Mixed-use residential, retail and restaurant	6677 Santa Monica Blvd	787	1,786	67	59
63	Mixed-use residential and retail	6100 Hollywood Blvd	151	343	19	11
64	Mixed-use	6230 Yucca St	95	216	55	7
65	Mixed-use (68 assisted-living apts w/ ret. & comm. spcs)	5245 Santa Monica Bl	68	154	155	5
66	Hotel	6600 Sunset Bl	0	0	75	0
67	Office	959 Seward St	0	0	960	0
68	Mixed-use residential and retail	6911 Santa Monica Blvd	374	849	45	28
71	Hollywood Passage (Mixed-use)	5550 Hollywood Bl	216	490	55	16
72	Wilcox Selma Office Condo	6156 Selma Ave	0	0	340	0
73	Quality restaurant	6608 Hollywood Bl	0	0	24	0
75	Restaurant/Club	6417 Selma Av	0	0	169	0
76	Selma & Vine Office Building	1601 Vine St	0	0	427	0
77	Mixed-Use Project	915 La Brea Av	219	497	286	16
78	Hollywood Production Center	1149 Gower St	57	129	0	4
79	Pharmacy/Drug Store	6766 Santa Monica Bl	0	0	40	0
80	Palladium Renovation	6215 Sunset Bl	0	0	30	0
81	Madame Tussaud's Wax Museum	6931 Hollywood Blvd	0	0	132	0
82	Target - Sunset Shopping Center	1417 N Western Ave	0	0	668	0
83	Highland Center Mixed-Use Project	1600 N Highland Ave	496	1,126	1,331	37
84	Lanewood Condos	7045 W Lanewood Ave	43	98	0	3
85	Pantages Theatre Office	6225 Hollywood Bl	0	0	856	0
86	Academy Museum of Motion Pictures	1313 Vine St	0	0	900	0
87	ASC Screening Room[f]	1782 N. Orange Dr	0	0	77	0
88	Condominiums	1645 Vine St	96	218	0	7
90	Metropolitan Hotel Site	5825 Sunset Bl	0	0	160	0
91	Retail (CIM/EISEN project)	6611 Hollywood Bl	0	0	181	0
92	Broadstone Hollywood	7060 Hollywood Bl	130	295	0	10
93	Palladium	6215 Sunset Bl	170	386	1,363	13
94	Capital Records Tower	1750 Vine St	450	1,022	1,000	34

Table IV.H-8 (Continued)
Related Projects Within the Hollywood Community Police Station Service Area

Related Project No.[a]	Project	Address	Number of Units	Residential Population[b]	Total Daytime Population[c]	Estimated No. of Crimes[d]
		Related Projects Total		**17,373**	**16,608**	**570**
		Project Total		**908**	**1,831**	**30**
		CUMULATIVE TOTAL		**18,281**	**18,439**	**600**

[a] *Determination of whether the related project is located within the Hollywood Community Police Station determined by entering the address of the related project into the City of Los Angeles' GeoQuest system (http://lageoquest.lacity.org/)*
[b] *For related projects with residential uses, the residential population was determined by multiplying the number of residential units by the average household size of 2.27 persons per unit within the Hollywood Community Plan Area.*
[c] *For related projects with non-residential uses, the non-residential population was determined based on the following generation factors as indicated in the L.A. CEQA Thresholds Guide (2006), Section K.1 Police Protection: 4 persons per 1,000 sq. ft. of office space, 3 persons per 1,000 sq. ft. of retail space, and 1.5 persons per hotel room. Any exceptions to this methodology are noted.*
[d] *The residential population was multiplied by the generation factor of 0.033 crimes per capita to estimate the number of crimes generated by related projects.*
[e] *No population was calculated for these uses since the increase in population for such uses would generally be accounted for in new residential uses and/or commercial uses within the area and would result in double counting.*
[f] *Based on the number of seats rather than population data (1 seat =1 person).*

Source: Matrix Environmental, 2009.

The residential uses of the project in conjunction with related projects could generate a cumulative total of 600 crimes per year. This represents a 7.9 percent increase in the Hollywood Community Police station's 2007 crime rate (7,601 crimes/year). However, similar to the project, it is anticipated that related projects would be reviewed by the LAPD to ensure that sufficient security measures would be implemented to reduce potential impacts to police protection services. Furthermore, given the project's proposed security design features, the project's contribution to cumulative impacts would be less than significant.

5. Mitigation Measures

As indicated above, impacts to police services would be less than significant. Notwithstanding, the following mitigation measures are recommended to further reduce impacts to police services:

Mitigation Measure H-3: The Project Applicant shall consult with the Los Angeles Police Department Crime Prevention Unit regarding crime prevention features appropriate for the design of the project.

Mitigation Measure H-4: Upon project completion, the Project Applicant shall provide the Hollywood Area Commanding Officer with a diagram of each portion of the property, including access routes, and provide additional information that might facilitate police response.

6. Level of Significance After Mitigation

With implementation of the project's proposed design features, impacts to police services would be less than significant. Furthermore, the mitigation measures described above would further reduce impacts.

IV. Environmental Impact Analysis

H.3 Public Services - Schools

1. Introduction

This section evaluates the project's potential impacts on existing school facilities operated by Los Angeles Unified School District (LAUSD). The analysis estimates the number of students that would be generated by the project using LAUSD student generation rates and focuses on whether LAUSD school facilities that would serve the project would have sufficient available capacity to accommodate these students. The analysis addresses all levels of educational facilities operated by LAUSD (i.e., elementary, middle, and high schools), as well as compliance with the regulatory framework. The analysis is based on written correspondence with LAUSD, which is included in Appendix G of this EIR.

2. Environmental Setting

a. Regulatory Framework

(1) California Education Code

Educational services for the project are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes.

(2) Senate Bill 50

Senate Bill 50 (SB 50), enacted in 1998, created a program for funding school facilities largely based on matching funds. The approval of Proposition 1A in 1998 authorized funds for SB 50 in the amount of $9.2 billion, including grants for new school construction and modernization of existing schools. The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 basis. Districts that are unable to provide some, or all, of the local match

requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.[24]

SB 50 also allows LAUSD to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. Pursuant to SB 50, LAUSD collects developer fees for new construction within its District boundaries. As of April 2009, the LAUSD collects the maximum new school construction facility fee at a rate of $3.83 per square foot of new residential construction, $0.47 per square foot of commercial construction, $0.09 per square foot of commercial parking structure construction, and $0.28 per square foot of self storage development. Payment of fees is required prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to a less than significant level.

b. Existing Conditions

LAUSD is the largest (in terms of number of students) public school system in California and the second-largest in the United States. LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles and all or portions of 32 other cities. During the 2007-2008 school year, LAUSD provided kindergarten through high school (K–12) education to a total of approximately 694,288 students, enrolled throughout 1,190 schools and centers, including 436 elementary schools, 75 middle schools, 64 senior high schools, 194 early education centers and occupational centers, and 118 charter schools and centers.[25]

LAUSD has experienced an increase in enrollment over the last decade, from 636,000 students in the 1994–1995 school year to approximately 694,288 students in the 2007–2008 school year. Further, LAUSD has recently implemented a class size reduction program. As part of an effort to create the needed additional space, LAUSD has implemented multi-track, year-round school calendars at many school sites. Currently, more than 200 schools are on multi-track year-round schedules to accommodate the heavy enrollment at these facilities. Other options utilized by LAUSD to address increased enrollment and reduce class size include open enrollment and providing portable

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[24] *State of California, Office of Public School Construction, School Facility Program Handbook, February 2006.*

[25] *LAUSD Office of Communications, Fingertip Facts 2007-2008, http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/COMMUNICATIONS/0708ENG_FINGERTIP_FACT_SHEET.PDF accessed June 11, 2008.*

classrooms and new permanent facilities. Transportation of students from overcrowded schools to less crowded schools is also a possible method to address overcrowding, though it is not a favored solution.

In addition to SB 50 funds, other major statewide funding sources for school facilities are Proposition 47, a $13.2 billion bond approved in November 2002, containing $11.4 billion for K–12 public school facilities, and Proposition 55, a $12.3 billion bond approved in March 2004, containing $10 billion to address overcrowding and accommodate future growth in K-12 schools. Local measures also provide additional funding for existing and new school construction projects.

Utilizing the funding sources described above, LAUSD has implemented the New School Construction Program, a multi-year capital improvement program valued at over $19.3 billion. The New School Construction Program is the major component of LAUSD's plan to relieve overcrowding in its schools by returning students to a single-track calendar, reducing class sizes to agreed limits at all grade levels, providing special education facilities, providing pre-kindergarten facilities, and reducing the reliance on portable classrooms. Since its inception in 2000 through Spring 2008, LAUSD has completed 73 new schools, 89 expansion/addition projects, and 41 new schools are under construction through the New School Construction Program.[26] The recent completion of these new facilities, has provided more than 74,000 new K-12 school seats.[27]

LAUSD is currently divided into eight Local Districts. As shown in Figure IV.H-3 on page IV.H-37, the project site is located in Local District 4. The schools that would serve the project site include Grant Elementary School, Le Conte Middle School, and Hollywood Senior High School. All three schools are currently operating on a multi-track year-round calendar. Table IV.H-9 on page IV.H-38 lists the schools, as well as their location, current calendar, current capacity, current enrollment, and available capacity. Per LAUSD, available capacity (seating overage/shortage) is based on the resident enrollment compared to the respective school's capacity. As shown in Table IV.H-9, Grant Elementary School, Le Conte Middle School, and Hollywood Senior High School are currently

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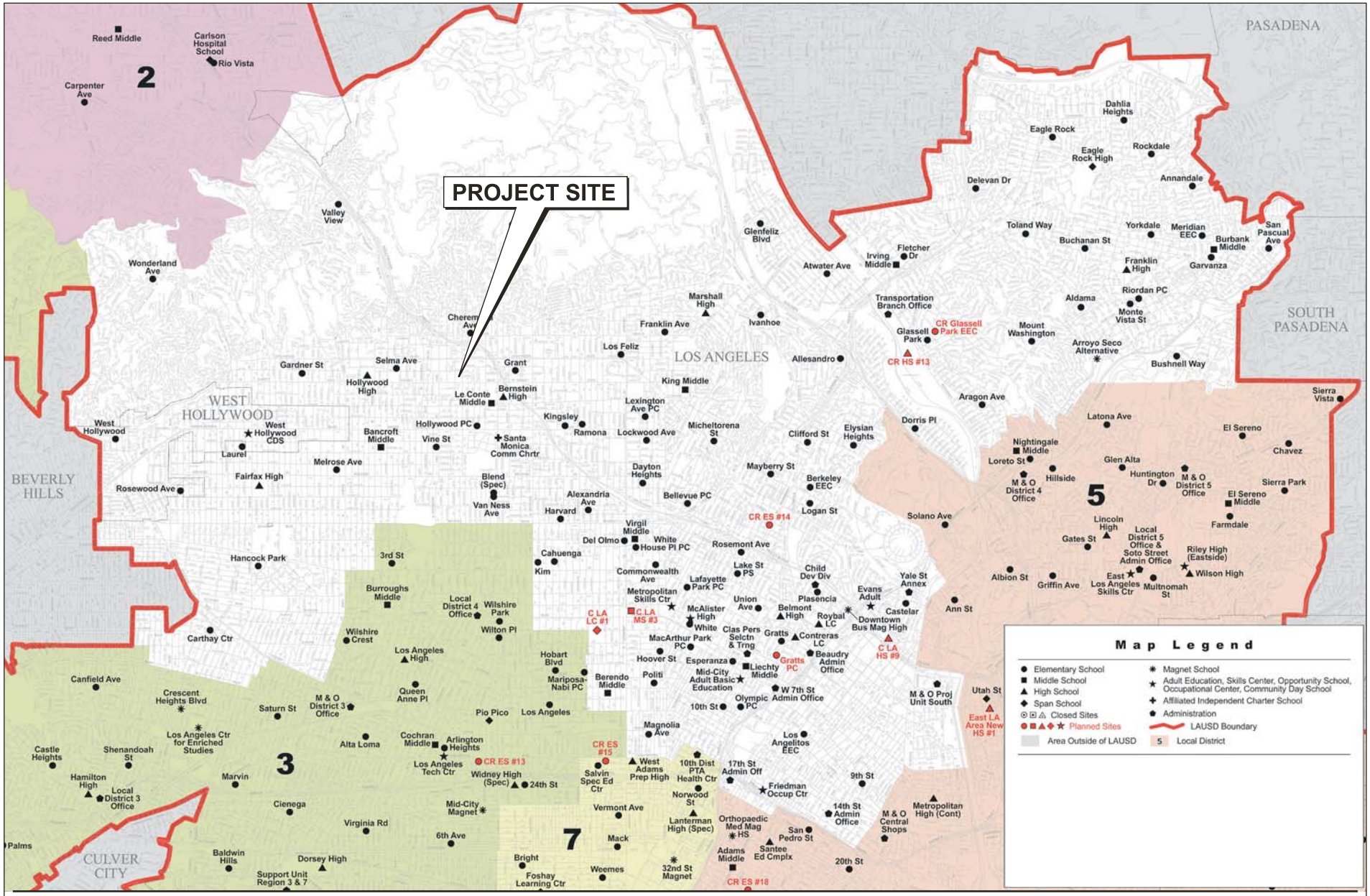
[26] *Los Angeles Unified School District Facilities Services Division, New Construction Monthly Program Status Report- Through August 15, 2008; Prepared for Facilities Committee Meeting, Bond Oversight Committee Meeting, September 2008; available online at: http://www.laschools.org/fs-general/download/NC-monthly-report.pdf, accessed September 19, 2008.*

[27] *LAUSD School District Facilities Services Division, BLUEPRINT Together We Change the Face of LA; Volume2, Spring 2008; available online at: http://www.laschools.org/fs-general/download/newsletters/spring-2008.pdf, accessed September 19, 2008.*



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0 1.5 Miles

Figure IV.H-3
LAUSD Local District 4 Map

Source: Master Planning and Demographic Branch, LAUSD Facilities Services Division, July 1, 2008

Table IV.H-9
2007-2008 Capacity and Enrollment of LAUSD Schools Serving the Project Site

School	Current Calendar	Current Capacity [a]	Resident Enrollment	Actual Enrollment	Current Seating (Overage/ Shortage) [b]	Overcrowded?
Grant Elementary School (K-5) 1530 N. Wilton Place	4 track	1,313	875	818	438	Yes
Le Conte Middle School (6-8) 1316 N. Bronson Avenue	3 track	2,503	2,087	1,888	416	Yes
Hollywood Senior High School (9-12) 1521 N. Highland Avenue	3 track	3,173	3,070	3,215	103	Yes

[a] *The maximum number of students the school can serve while operating on its current calendar.*
[b] *Per LAUSD, seating overage/shortage is current capacity minus resident enrollment.*
[c] *A school is considered to be overcrowded if 1) it currently operates on a multi-track calendar, 2) there is currently a capacity shortage, or 3) there is currently a capacity overage of less than or equal to a 'safety margin' of 30 seats.*

Source: LAUSD Facilities Services Division, LAUSD Schools Enrollment and Capacities Report, June 2007 and September 2008. Refer to Appendix G of this EIR.

operating below capacity with an excess of seats on their multi-track calendar. LAUSD considers a school to be overcrowded if any one of the following occurs: (1) it currently operates on a multi-track calendar; (2) there is currently a capacity shortage; or (3) there is currently a capacity overage of less than or equal to a 'safety margin' of 30 seats. Therefore, as shown in Table IV.H-9, currently all three schools are considered to be overcrowded since they all operate on a multi-track calendar.

3. Project Impacts

a. Methodology

(1) Construction

The analysis of construction-related impacts to schools is based on a review of the anticipated construction haul route for the project compared to location of, and designated pedestrian routes for, school(s) located in the project vicinity. The analysis then qualitatively assesses whether construction of the project and associated construction vehicle travel along the haul routes would impact schools, or pedestrian routes to schools

(2) Operation

The analysis of operational impacts to schools is based in part on the ability of LAUSD school facilities to accommodate the potential increase in students generated from

development of the project. The analysis addresses all levels of education facilities operated by LAUSD (i.e., elementary, middle, and high schools). This analysis is focused on LAUSD Local District 4 facilities, as impacts to surrounding districts are not anticipated to occur. This conclusion is supported by the general practice that students attending public schools attend the schools in the district where their residence is located, which is District 4 for future residents of the project. Project-generated students that attend public schools in other school districts would be required to obtain an inter-district transfer permit issued by both the school within which the student is enrolled, as well as the school of interest. Furthermore, approvals for inter-district transfers are subject to a determination that the incoming transfer students could be accommodated without creating an impact on its existing facilities.

The analysis estimates the number of students that would be generated by the project using 2008 LAUSD student generation rates, and focuses on whether LAUSD school facilities expected to serve the project would have sufficient available capacity to accommodate these students. The anticipated number of new students was calculated using student generation rates issued by LAUSD. Once calculated, the number of project-generated students was compared to LAUSD's projected available capacity at each school that serves the project site to identify the extent to which students could be accommodated within these facilities.

b. Significance Thresholds

According to the *City of L.A. CEQA Thresholds Guide (2006),* the following factors determine the level of significance on a case-by-case basis:

- The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand;
- Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school (s); and
- Whether the project includes features that would reduce the demand for school services (i.e., on-site school facilities or direct support to LAUSD).

c. Analysis of Project Impacts

(1) Construction

Construction vehicles traveling to and from the project site would generally travel along the US-101 Freeway, Sunset Boulevard, Gower Street, and El Centro Avenue. With regard to the project, the anticipated route for construction vehicles arriving at the project site if traveling north on the US-101 Freeway, would be to exit the US-101 Freeway at Sunset Boulevard, veer right and cross over the US-101 Freeway onto Sunset Boulevard, and turn right at either Gower Street or El Centro Avenue. If traveling south on the US-101 Freeway, construction vehicles would exit the 101 Freeway at Hollywood Boulevard, travel south along Van Ness Avenue, turn right at Sunset Boulevard, and right at either Gower Street or El Centro Avenue. The anticipated route for construction vehicles leaving the project site would be to exit the project site onto Sunset Boulevard traveling east toward the US-101 Freeway.

There is only one school located along the above-described routes, Grant Elementary School (1530 North Wilton Place). This elementary school is located immediately northeast of the US-101 Freeway northbound off-ramp near Sunset Boulevard. As illustrated in Figure IV.H-4 on page IV.H-41, the intersection of Wilton Place and Harold Way, which is designated by the LADOT as a pedestrian route for the elementary school, is located near the US-101 Freeway off-ramp. Moreover, a crossing guard is located at this intersection. However, there is a fork located within the off-ramp prior to reaching this intersection. Vehicles have the ability to stay to the left and access the intersection of Wilton Place and Harold Way, or veer to the right and access Sunset Boulevard. Because the project site is located along Sunset Boulevard, construction vehicles would veer to the right to access Sunset Boulevard and travel toward the project site. Therefore, construction vehicles associated with the project would avoid the intersection of Wilton Place and Harold Way. As such, Grant Elementary School would not be significantly impacted during project construction-related activities including worker travel, hauling activities, and the delivery of construction materials. Construction impacts on schools would be less than significant.

(2) Operation

The LAUSD Developer Fee Program Office has established student generation rates for a variety of uses including residential (single-family detached, single-family attached, and multi-family), hotels/motels, retail and services, offices, research and development, industrial/ warehouse/manufacturing, hospitals, and parking structures. As described in Section II, Project Description, of this EIR, the project would result in the development of 400 residential units, a 125-room (98,500 square feet) hotel, 41,300 square feet of retail and restaurant/bar uses (including retail and restaurant/bar

Legend

- Recommended Crossing
- Stop Sign
- Traffic Signal
- Crossing Guard
- Flashing Warning Light
- Stairs or Walkway
- Pedestrian Bridge
- Pedestrian Tunnel
- Parks

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W E
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Parents:

This map shows the recommended crossings to be used from each block in your school attendance area. Following the arrows, select the best route from your home to the school and mark it with a colored pencil or crayon. This is the route your child should take. Instruct your child to use this route and to cross streets only at locations shown. You and your child should become familiar with the route by walking it together. Obey marked crosswalks, stop signs, traffic signals and other traffic controls. Crossing points have been located at these controls wherever possible, even though a longer walk may be necessary. Instruct your child to always look both ways before crossing the street. If no sidewalk exists, your child should walk facing traffic.

Estimados Padres:

Este mapa muestra los cruzados recomendados para los peatones de cada cuadra en la area de su escuela. Siguiendo las flechas en el mapa, selecione la ruta mas segura de su casa a la Escuela y marquelo con un lapis o tiza de color. Esta es la ruta que su hijo (a) debe de usar. Digale a su hijo (a) que use esta ruta y que cruce las calles solamente en los lugares indicados. Usted y su hijo (a) deberian de familiarizarce con esta ruta. Obedezcan los rotulos de peatones, de altos, semaforos y todos los señales de trafico. Puntos para cruzar estan localizados en areas controladas, aunque sea necesario de alargar el tiempo para cruzar. Instruye a su hijo (a) que siempre se fije de los dos lados antes de cruzar la calle. El estudiante debe de siempre caminar en la direccion opuesta del trafico si no existe una banqueta.

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Figure IV.H-4
Grant Elementary School
Pedestrian Routes

Source: City of Los Angeles - Department of Transportaion, October 2006

uses within the hotel), 380,000 square feet of office uses and 689,000 square feet of parking uses. LAUSD student generation rates for the aforementioned uses are shown in Table IV.H-10 on page IV.H-43. Thus, as shown in Table IV.H-11 on page IV.H-43, the project would generate a total of 203 K-12 students, consisting of 98 elementary school students, 49 middle school students, and 56 high school students.

As previously discussed, students generated by the project would attend Grant Elementary School, Le Conte Middle School, and Hollywood Senior High School. Figure IV.H-5 on page IV.H-44 depicts the location of these three schools in relation to the project site. Build-out of the project is expected to occur in 2013. Therefore, students generated by the project would likely enroll in these LAUSD schools in the 2012-2013 or the 2013-2014 school year. However, because LAUSD limits enrollment forecasts to five-year projections, the furthest forecast projection available is for the 2012-2013 school year. As shown in Table IV.H-12 on page IV.H-45, during the 2012-2013 school year, Grant Elementary School is projected to have an excess of approximately 311 seats. With the addition of the 98 project-generated elementary students, Grant Elementary School would have an excess of 213 seats. During the 2012-2013 school year, Le Conte Middle School is projected to have an excess of approximately 48 seats. With the addition of the 49 project-generated middle school students, Le Conte Middle School would have a shortage of one seat. During the 2012-2013 school year, Hollywood Senior High School is projected to have an excess of 671 seats. With the addition of the 56 project-generated high school students, Hollywood Senior High School would have an excess of approximately 615 seats. Additionally, as shown in Table IV.H-12, LAUSD has recently completed a new high school (Helen Bernstein High School) in the area through the New School Construction Program to relieve overcrowding.

Helen Bernstein High School, located at 1309 N. Wilton Place, has a capacity of approximately 2,106 seats and was opened in Fall 2008.[28] This new high school helped offset projected overcrowding at Hollywood Senior High School as well as other overcrowded high schools in the area. Figure IV.H-5 above depicts the location of this new high school.

[28] *Los Angeles Unified School District, Facilities Services Division, Monthly Program Status Report, April 2008.*

Table IV.H-10
LAUSD Student Generation Rates

School Level	Single Family Dwelling (per unit) [a]	Hotel/Motel (per 1, 000 s.f.)	Retail and Restaurant Services (per 1, 000 s.f.)	Office (per 1, 000 s.f.)	Parking Structure (per 1, 000 s.f.)
Elementary School (K-5)	0.2032	0.0118	0.0234	0.0366	0.0009
Middle School (6-8)	0.1002	0.0063	0.0123	0.0193	0.0005
High School (9-12)	0.1167	0.0062	0.0123	0.0192	0.0005

[a] *The Single Family Dwelling generation factors were used in this analysis as they provide the most conservative residential student generation and the project's residential unit type (e.g., condos, apartments) has not yet been determined.*

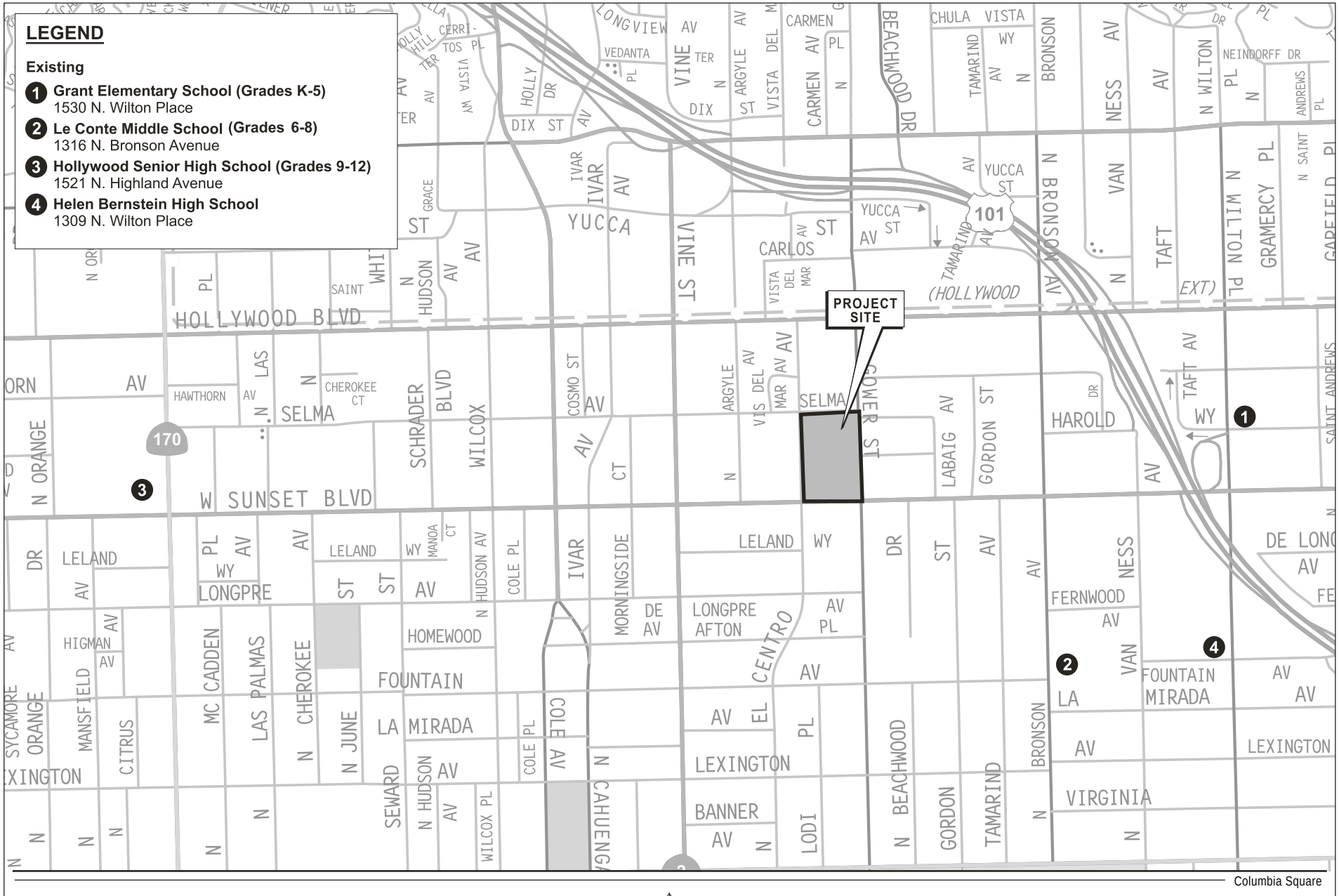
Source: LAUSD Student Generation Rate Calculation, September 2008 and LAUSD Commercial/Industrial Development School Fee Justification Study, February 2008. Refer to Appendix G of this EIR.

Table IV.H-11
Estimated Number of Students to be Generated by the Proposed Project

Age	Uses	Factor				Proposed	Students Generated
Kindergarten through 5th Grades							
	Single Family Residential [b]	0.2032	per	1	du	400	81.2
	Retail/Restaurant	0.0234	per	1,000	s.f.	41,300	1
	Office	0.0366	per	1,000	s.f.	380,000	13.9
	Hotel (125 rooms)	0.0118	per	1,000	s.f.	98,500	1.2
	Parking Structure	0.0009	per	1,000	s.f.	689,000	0.6
						Subtotal	*98*[a]
6th through 8th Grades							
	Single Family Residential [b]	0.1002	per	1	du	400	40
	Retail/Restaurant	0.0123	per	1,000	s.f.	41,300	0.5
	Office	0.0193	per	1,000	s.f.	380,000	7.3
	Hotel (125 rooms)	0.0063	per	1,000	s.f.	98,500	0.6
	Parking Structure	0.0005	per	1,000	s.f.	689,000	0.3
						Subtotal	*49*[a]
9th through 12th Grades							
	Single Family Residential [b]	0.1167	per	1	du	400	46.6
	Retail/Restaurant	0.0123	per	1,000	s.f.	41,300	1
	Office	0.0192	per	1,000	s.f.	380,000	7
	Hotel (125 rooms)	0.0062	per	1,000	s.f.	98,500	1
	Parking Structure	0.0005	per	1,000	s.f.	689,000	0
						Subtotal	*56*[a]
						Project Total	**203**

[a] *Rounded to the nearest whole number.*
[b] *The Single Family Dwelling generation factors were used in this analysis as they provide the most conservative residential student generation and the project's residential unit type (e.g., condos, apartments) has not yet been determined.*

Source: Matrix Environmental, 2009.



matrix environmental

Figure IV.H-5
Location of Existing and New Schools Serving the Project Site

Source: Matrix Environmental, 2009

Table IV.H-12
Projected Capacity and Enrollment of LAUSD Schools Serving the Project Site with Project

School	Projected 2012-2013 Capacity [a]	Projected 2012-2013 Enrollment [b]	Projected Overage/ (Shortage) [c]	Project-Generated Students	Project Impact?
Existing					
Grant Elementary School (K-5) 1530 N. Wilton Place	925	614	311	98	No
Le Conte Middle School (6-8) 1316 N. Bronson Avenue	1,379	1,331	48	49	**Yes**
Hollywood Senior High School (9-12) 1521 N. Highland Avenue	1,810	1,139	671	56	No
Recently Completed					
Helen Bernstein High School 1309 N. Wilton Place	2,106	-	-	-	

[a] *Based on a 5-year projection that takes into consideration the operational goals of the New School Construction Program (e.g., single-track calendar, full-day kindergarten, reduced class sizes, etc.).*
[b] *Based on a 5-year projection of the total number of students that are both living in the school's attendance area and eligible to attend the school. Includes secondary-grades magnet students.*
[c] *Projected capacity minus projected 2011-2012 enrollment.*

Source: LAUSD Facilities Services Division, LAUSD Schools Enrollments and Capacities Report, June 2007 and September 2008. Refer to Appendix G of this EIR.

It should be noted that the number of students that would attend LAUSD schools serving the project may be less than calculated since the analysis does not include LAUSD options that would allow project-generated students to enroll at other LAUSD schools located away from their home attendance area, or students that may enroll in private schools or participate in home schooling. The LAUSD options include the following:

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

- Magnet schools and magnet centers are open to all students in LAUSD. Transportation is provided to students who participate in magnet programs who live outside a two-mile radius or outside the magnet school attendance boundary;

- The Permits With Transportation Program (PWT) allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. A feeder pattern is the linkage from elementary school, middle school, and high school. LAUSD provides transportation to all students enrolled in the PWT Program regardless of where they live within LAUSD;

- Intra-district parent employment-related transfer permits allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed;

- Sibling permits enable students to enroll in a school where a sibling is already enrolled;

- Child care permits allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency or private organization or a verifiable child care provider; and

- Students generated by the project may attend private schools to a greater extent than the rate that is incorporated into LAUSD's student generation factors.

As the project's student generation forecast may be overstating the actual student generation, the analysis presents a conservative assessment of the project's potential impacts on LAUSD facilities. As shown in Table IV.H-12, the elementary and high schools s serving the project (i.e., Grant Elementary School and Hollywood Senior High School) would not be significantly impacted due to project build-out, while the middle school serving the project site (i.e., Le Conte Middle School) could be impacted as it is projected to have a seating shortage of one seat due to the addition of project-generated students during the 2012-2013 school year. However, pursuant to Section 65995 of the California Government Code, with the payment of developer impact fees in accordance with SB 50 as outlined in Mitigation Measure H-5 below, project-related impacts on LAUSD school facilities would be reduced to a less than significant level. Compliance with SB 50 is considered full and complete mitigation.

(3) Consistency with Regulatory Framework

The project would be required to comply with SB 50, which requires payment of developer fees to LAUSD prior to issuance of building permits to mitigate the project's impacts on public school facilities. The project Applicant would pay the developer fees that are in effect at the time of building permits. Payment of the SB 50 fees would ensure consistency of the project with applicable regulations.

4. Cumulative Impacts

Section III of this EIR identifies 94 related projects that are anticipated to be developed within the vicinity of the project site. For purposes of this cumulative analysis on schools, only those related projects located within the attendance boundaries of the schools serving the project site (i.e., Grant Elementary School, Le Conte Middle School,

and Hollywood Senior High School) were considered. Moreover, related projects that are located within the attendance boundaries but do not constitute uses that typically generate students (i.e., theaters, private schools, and senior housing) were also excluded from the analysis as such uses would not be expected to generate students within a public school. This approach is further supported by the fact that LAUSD does not employ generation rates for such uses. The related projects listed in Table IV.H-13 on page IV.H-48 would cumulatively generate, in conjunction with the project, new students at Grant Elementary School, Le Conte Middle School, and Hollywood Senior High School. Similar to the project, the number of students anticipated to be generated by related projects was estimated based on the type of development proposed.

As shown in Table IV.H-13 the related projects located within the school attendance boundaries could potentially generate 372 elementary school students, 257 middle school students, and 304 high school students. The project in conjunction with related projects could therefore generate 470 elementary school students, 306 middle school students, and 360 high school students. The project and related projects combined would exceed the projected capacities of Grant Elementary School and Le Conte Middle School. As previously mentioned, there are no immediate plans by LAUSD to expand existing or construct new elementary or middle schools in the vicinity of the project site. However, as previously discussed, all related projects would be required to pay developer fees to LAUSD. The payment of the developer fees under the provisions of SB 50 would constitute as full mitigation for all impacts from all projects to school facilities. Therefore, cumulative impacts to LAUSD schools serving the project site would be less than significant.

5. Mitigation Measures

Mitigation Measure H-5: Pursuant to California Government Code Section 65995, the Project Applicant shall pay developer fees to Los Angeles Unified School District prior to the issuance of building permits.

6. Level of Significance After Mitigation

With implementation of Mitigation Measure H-5 which ensures that the project Applicant will pay SB 50 developer fees, project impacts related to the school facilities serving the project site, including Grant Elementary School, Le Conte Middle School, and Hollywood Senior High School, would be less than significant.

Table IV.H-13
Related Projects within Attendance Boundaries
of LAUSD Schools Serving the Project Site

ID	Project	Address	Grant St. Elementary Students [a, b, c]	Le Conte Middle School Students [a, b, c]	Hollywood High School Students [a, b, c]
1	Mini-mart & liquor store	1674 Hillhurst Av	-	-	-
2	Shopping Center	145 La Brea Av	-	-	-
3	Fast food restaurant w/drive thru & specialty retail	5777 Hollywood Bl	0.20	0.10	0.10
4	Hotel & specialty retail	6107 Hollywood Bl	-	0.60	0.59
5	Gas station w/mini-mart	1934 Cahuenga Bl	-	0.00	0.00
6	Cocktail lounge	1600 Vine St	0.28	0.15	0.15
7	Sunset Legacy Lofts	7950 Sunset Bl	-	-	-
8	Private School	221 Westmoreland Av	-	-	-
9	Apartments & retail	5920 Melrose Av	-	-	-
10	Park La Brea Apt Addition	6300 3rd St	-	-	-
11	Mixed-Use	5600 Wilshire Bl	-	-	-
12	Mixed-Use	648 Western Av	-	-	-
13	Fairfax Av Mixed-Use	801 Fairfax Av	-	-	-
14	Apartments	5165 Fountain Av	-	9.28	9.26
15	Apartments & retail	922 Western Av	-	5.48	5.47
16	Apartments	6142 Franklin Av	-	10.97	10.95
17	Condos & retail	600 Hobart Bl	-	-	-
18	Apartments	3800 Wilshire Bl	-	-	-
19	Condos	6735 Yucca St	-	-	1.64
20	Apartments	6298 3rd St	-	-	-
21	Condos	1714 Mc Cadden Pl	-	-	6.63
22	Private elementary school expansion	238 Manhattan Pl	-	-	-
23	Office	936 Crenshaw Bl	-	-	-
24	Mixed-Use	1611 La Brea Av	-	-	5.64
25	Quality Restaurant & Jazz Club	6531 Hollywood Bl	-	-	0.08
26	Hollywood/Garfield Mixed Use	5555 Hollywood Bl	15.58	9.24	9.22
27	Condos	1736 Mc Cadden Pl	-	-	6.63
28	Mixed-Use	5400 Hollywood Bl	6.13	3.63	3.62
29	Rite-Aid w/ drive-thru	6726 Sunset Bl	-	-	0.20
30	LAUSD - Cen Reg Mid School #5	Fountain Av	0.00	0.00	0.00
31	Mixed-Use	1717 Vine St	-	1.38	1.80
32	Mixed-Use	3670 Wilshire Bl	-	-	-
33	Desmond's Tower Res. Dev.	5500 Wilshire Bl	-	-	-
34	Mixed-Use	4500 Los Feliz Bl	-	-	-
35	Mixed-Use	450 Western Av	-	-	-
36	Hollywood & Vine Mixed-Use	6250 Hollywood Blvd	65.15	37.75	38.75
37	Mixed-use	5651 Santa Monica Bl	-	41.53	41.44
38	Gas station	5420 Sunset Bl	-	0.00	0.00
39	Runyon Canyon Park-Parking Lot	2000 Fuller Av	-	-	0.00
40	Office Building	6040 Sunset Bl	4.39	2.32	2.30
41	BLVD 6200 (south) - mixed-use	6200 Hollywood Bl	139.74	82.70	82.50
42	Mixed-Use	694 Hobart Bl	-	-	-

Table IV.H-13 (Continued)
Related Projects Within Attendance Boundaries
of LAUSD Schools Serving the Project Site

ID	Project	Address	Grant St. Elementary Students [a, b, c]	Le Conte Middle School Students [a, b, c]	Hollywood High School Students [a, b, c]
43	Mixed-use	6915 Melrose Av	-	-	-
44	Third Street Mixed-Use Project	5863 3rd St.	-	-	-
45	KTLA office/studio expansion	5800 Sunset Bl	27.12	14.30	14.23
46	Sunset & Gordon Mixed-use (Old Spaghetti Factory)	5935 Sunset Bl	6.85	3.44	4.51
47	Sunset & Vine Mixed-Use	1538 Vine St	45.07	26.66	26.60
48	LA Holocaust Museum	7600 Beverly Bl	-	-	-
49	Argyle Lofts	1800 Argyle Av	-	6.61	6.59
50	Restaurant	6757 Hollywood Bl	-	-	0.16
51	Apts & retail (1/2 of blk Yucca & Highland & McCadden)	6758 Yucca St	-	-	22.84
52	La Brea Urban Lofts	101 La Brea Av	-	-	-
53	Restaurant & office	725 Curson Av	-	-	-
54	Restaurant (w/ gourmet shop)	6523 Hollywood Bl	-	-	0.19
55	Rest. & multi-purpose entertainment venue	6506 Hollywood Bl	-	-	0.16
56	Condos & retail	5663 Melrose Av	-	-	-
57	HK Town Project (Mixed-Use)	100 Western Ave	-	-	-
58	Retail & office bldg	6904 Holllywood Bl	-	-	0.69
59	Mixed-use residential and retail	3324 Wilshire Bl	-	-	-
60	Residential Development	6001 Carlton Wy	1.93	0.97	1.28
61	Temple Israel of Hollywood expansion	7300 Hollywood Blvd	-	-	0.00
62	Mixed-use residential, retail and restaurant	6677 Santa Monica Blvd	-	-	66.54
63	Mixed-use residential and retail	6100 Hollywood Blvd	21.60	12.82	12.79
64	Mixed-use	6230 Yucca St	-	3.07	3.69
65	Mixed-use (68 assisted-living apts w/ ret. & comm. spcs)	5245 Santa Monica Bl	-	6.37	6.36
66	Hotel	6600 Sunset Bl	-	-	0.31
67	Office	959 Seward St	-	-	-
68	Mixed-use residential and retail	6911 Santa Monica Blvd	-	-	11.55
69	Wilshire La Brea High Rise	5200 Wilshire Bl	-	-	-
70	Mixed-Use	3200 Beverly Bl	-	-	-
71	Hollywood Passage (Mixed-use)	5550 Hollywood Bl	10.34	5.19	6.79
72	Wilcox Selma Office Condo	6156 Selma Ave	3.11	1.64	1.63
73	Quality restaurant	6608 Hollywood Bl	-	-	0.10
74	Almond Tree Village	3400 3rd St	-	-	-
75	Hotel/Restaurant/Club	6417 Selma Av	-	-	0.70
76	Selma & Vine Office Building	1601 Vine St	-	-	2.04
77	Mixed-Use Project	915 La Brea Av	-	-	-
78	Hollywood Production Center	1149 Gower St	-	2.60	2.86
79	Pharmacy/Drug Store	6766 Santa Monica Bl	-	-	-
80	Palladium Renovation	6215 Sunset Bl	0.23	0.12	0.12

Table IV.H-13 (Continued)
Related Projects Within Attendance Boundaries
of LAUSD Schools Serving the Project Site

ID	Project	Address	Grant St. Elementary Students [a, b, c]	Le Conte Middle School Students [a, b, c]	Hollywood High School Students [a, b, c]
81	Madame Tussauds Wax Museum	6931 Hollywood Blvd	-	-	0.02
82	Target - Sunset Shopping Center	1417 N Western Ave	5.21	2.74	2.74
83	Highland Center Mixed-Use Project	1600 N Highland Ave	-	-	21.07
84	Lanewood Condos	7045 W Lanewood Ave	-	-	1.31
85	Pantages Theatre Office	6225 Hollywood Bl	-	4.13	4.11
86	Academy Museum of Motion Pictures	1313 Vine St	-	-	0.00
87	ASC Screening Room	1782 N. Orange Dr	-	-	0.00
88	Condominiums	1645 Vine St	-	-	2.92
89	Hospital expansion	4747 Sunset Bl	-	-	-
90	Metropolitan Hotel Site	5825 Sunset Bl	0.00	0.00	0.00
91	Retail (CIM/EISEN project)	6611 Hollywood Bl	-	-	0.74
92	Broadstone Hollywood	7060 Hollywood Bl	-	-	3.95
93	Palladium Mixed-Use Project	6215 Sunset Bl	19.55	10.12	11.33
94	Capital Records Tower	1750 Vine St	-	42.40	42.28
		Related Projects Total	**372**	**257**	**304**
		Project Total	**98**	**49**	**56**
		CUMULATIVE TOTAL	**470**	**306**	**360**

Notes: (-) indicates that the related project is not located within school boundaries

[a] *Calculated by multiplying each of the proposed uses by its respective student generation rate issued by LAUSD. LAUSD has established student generation rates for residential (single-family detached, multi-family), retail and services, offices, research and development, industrial/ warehouse/manufacturing, hospitals, hotels/motels, and parking structures.*

[b] *Please note that the attendance boundaries are not the same for all three levels of schools. For example, a related project may be located within the attendance boundaries of the elementary school (Grant Elementary School) but not within the attendance boundaries of the middle school (Le Conte Middle School) or high school (Hollywood Senior High School). This was taken into consideration when doing the calculations. This has been indicated by dashes (-).*

[c] *In some instances the number of students generated is <1 and is therefore shown as 0.*

Source: Matrix Environmental, 2009.

1. Introduction

This section describes the parks and recreational facilities that would serve the project's future residents and analyzes the potential impacts related to these services that would occur as a result of implementation of the project. The analysis also evaluates the project's provisions for open space compared to applicable City goals and regulatory requirements. Information regarding parks and recreational facilities surrounding the project site was provided in part by the City of Los Angeles Recreation and Parks Department.

2. Environmental Setting

a. Regulatory Framework

(1) State Level

(a) Quimby Act

Section 66477 of the California Government Code, known as the Quimby Act, was enacted in an effort to promote the availability of park and open space areas in response to California's rapid urbanization and decrease in the number of parks and recreational facilities. The Quimby Act also authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Thus, pursuant to the Quimby Act, Los Angeles Municipal Code (LAMC) Section 17.12 was authorized and is discussed below.

Under the Quimby Act, dedications of land are not to exceed three acres of parkland per 1,000 persons residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to provide three acres of parkland per 1,000 persons, unless the amount of existing neighborhood and community parkland exceeds that limit. As the parkland standard is not exceeded in the project area (discussed below), the maximum exaction for the project under the Quimby Act is three acres of parkland per 1,000 persons.

(2) Local Level

The City of Los Angeles General Plan indicates that a park and recreation system should address standards in the following three areas: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. Facilities should be provided at the neighborhood, community, and regional levels.

Within the City's General Plan, the Public Recreation Plan (PRP) establishes policies and standards related to parks, recreation facilities, and open space areas in the City. The PRP provides Citywide goals, objectives, and recommendations concerning parks and recreation facilities. Park and open space requirements pursuant to the Quimby Act are also set forth in Sections 12.21 and 17.12 of the LAMC. The following provides information regarding both the PRP and applicable LAMC standards and requirements.

(a) Public Recreation Plan

Adopted in 1980 by the Los Angeles City Council, the PRP focuses on the development of physical facilities by emphasizing the provision of neighborhood and community recreation sites, including community buildings, gymnasiums, swimming pools, and tennis courts.[29] To a larger extent, the PRP focuses on facility planning in residential areas, as these areas have the greatest demand for parks and recreational facilities. The PRP also establishes general locations for future facilities based on a proposed service radius and projected population levels.

According to the standard park characteristics identified in the PRP, park facilities are discussed in terms of local parks and regional facilities. Local parks comprise neighborhood and community recreation sites, open space, and "small" parks, typically characterized as less than one acre in size. A neighborhood park typically provides space and facilities for outdoor and indoor recreation activities intended to serve residents of all ages within the immediate neighborhood. Neighborhood parks typically include a recreation building, multi-purpose field, hard court area, play apparatus, picnic area, off-street parking, and a maintenance area. Although the ideal size for a neighborhood park is considered to be ten acres, such parks within the City of Los Angeles are typically one to five acres in size. Community parks are designed to serve residents of all ages in several surrounding neighborhoods and include such facilities as a community building, multi-

[29] *City of Los Angeles Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, approved October 9, 1980.*

purpose fields, hard court areas, parking, maintenance service areas, and play areas. These facilities may also include baseball diamonds, football and soccer fields, tennis and handball courts, and a swimming pool. According to the PRP, the ideal size for a community park is considered to be 15 to 20 acres.

The PRP also states that the location and allocation of acreage for neighborhood and community parks and recreational facilities should be determined on the basis of the service radius within residential areas throughout the City. The desired long-range standard for local parks is based on a minimum of two acres per 1,000 persons for neighborhood parks with a service radius of 0.5 mile, and a minimum of two acres per 1,000 persons for community parks with a service radius of two miles. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons for neighborhood parks within a one-mile service radius and one acre per 1,000 persons for community parks within a two mile service radius. The PRP also establishes that no park or recreational facility shall be diminished in size or removed from any service radius unless the required acreage is replaced elsewhere within that same service radius, or the need is diminished due to population and/or land use changes.

(b) Los Angeles Municipal Code

Section 12.21 of the LAMC requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms (e.g., studios and one-bedroom units), 125 square feet for each unit having three habitable rooms (e.g., two-bedroom units), and 175 square feet for each unit having more than three habitable rooms (e.g., three-bedroom units. Section 12.21 of the LAMC also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of common and/or private areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas should incorporate recreational amenities such as swimming pools, spas, children's play areas, and sitting areas and must be a minimum of 400 square feet. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs, or trees. In addition, indoor recreation rooms cannot constitute more than 25 percent of the total required usable open space. Private open space is an area which is contiguous to and immediately accessible from an individual dwelling unit and must be enclosed by a fence at least four feet in height. Private open space may have a dimension of no less than six feet in any direction and must contain a minimum of 50 square feet per dwelling unit, of which no more than 50 square feet per dwelling unit can be counted towards the total required usable open space.

In addition, Section 17.12 of the LAMC, enacted pursuant to the Quimby Act, requires developers of new subdivisions to dedicate land for parks and recreation purposes or pay fees for park improvements in lieu of such dedication. The area of land that is required to be dedicated for park and recreation uses is determined by the maximum density permitted by the zone within which the site is located. Park fees may be paid in lieu of the dedication of all or a portion of all of the land. These fees are adjusted annually and are based upon each dwelling unit to be constructed and the zoning designation of the site.

Section 17.12 of the LAMC allows recreation areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication requirement. Recreational areas that qualify under this provision of Section 17.12 include, in part, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment comparable in type and quality to those found in City parks. Furthermore, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all of the residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public recreation and park facilities.

b. Existing Conditions

The City of Los Angeles Department of Recreation and Parks (DRP) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the project vicinity. Currently, the DRP maintains and operates more than 390 sites for recreational use including: 180 recreation centers, 59 swimming pools, 13 municipal golf courses, nine lakes, seven camps both in and out of City limits, more than a dozen museums and historic sites, and hundreds of programs for youth, senior, physically disabled, and volunteers. The DRP also administers more than 15,600 acres of parkland, including 4,217 acres in Griffith Park, one of the largest municipal parks within the boundaries of an American city.[30]

The City maintains a Citywide parkland to population ratio of 0.70 acre of neighborhood and community parkland per 1,000 residents. The project is located in the high density Hollywood Community Plan Area in which the park facilities are heavily used by youths, families, and seniors. In this area, the neighborhood and community parkland to population ratio is 0.41 acre per 1,000 residents. The Citywide and Hollywood Community Plan ratios currently do not meet the City's short- and intermediate-range neighborhood and community parkland standards of one acre per 1,000 persons within a one-mile service

[30] *Los Angeles Department of Recreation and Parks, online at: http://www.laparks.org/.*

radius for neighborhood parks, nor that of one acre per 1,000 persons within a two-mile radius for community parks.[31]

Table IV.H-14 on page IV.H-56 lists the parks and recreational facilities located within n approximately two mile radius of the project site. Figure IV.H-6 on page IV.H-57 shows the location of these park and recreational facilities in relation to the project site. As shown in Table IV.H-14, the parks and recreational facilities within the project vicinity total more than 4,400 acres. In addition, the DRP is currently in the development stage of Seily Rodriguez Park, a 0.34 acre pocket park located at 5707 Lexington Avenue, approximately one mile east of the project site.

3. Project Impacts

a. Methodology

The analysis of parks and recreation impacts is based on a comparison of the project's provision of recreation and open space areas to the standards set forth by the Quimby Act, the PRP, and the LAMC. To be consistent with the standards set forth in the aforementioned regulatory guidance documents, the analysis of impacts is based on the acreage of open space available per 1,000 project residents.

b. Significance Thresholds

Based on the *City of L.A. CEQA Thresholds Guide (2006)*, the determination of significance for impacts to parks and recreation is made on a case-by-case basis, considering the following factors:

The net population increase resulting from the proposed project.

- The demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand.

- Whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

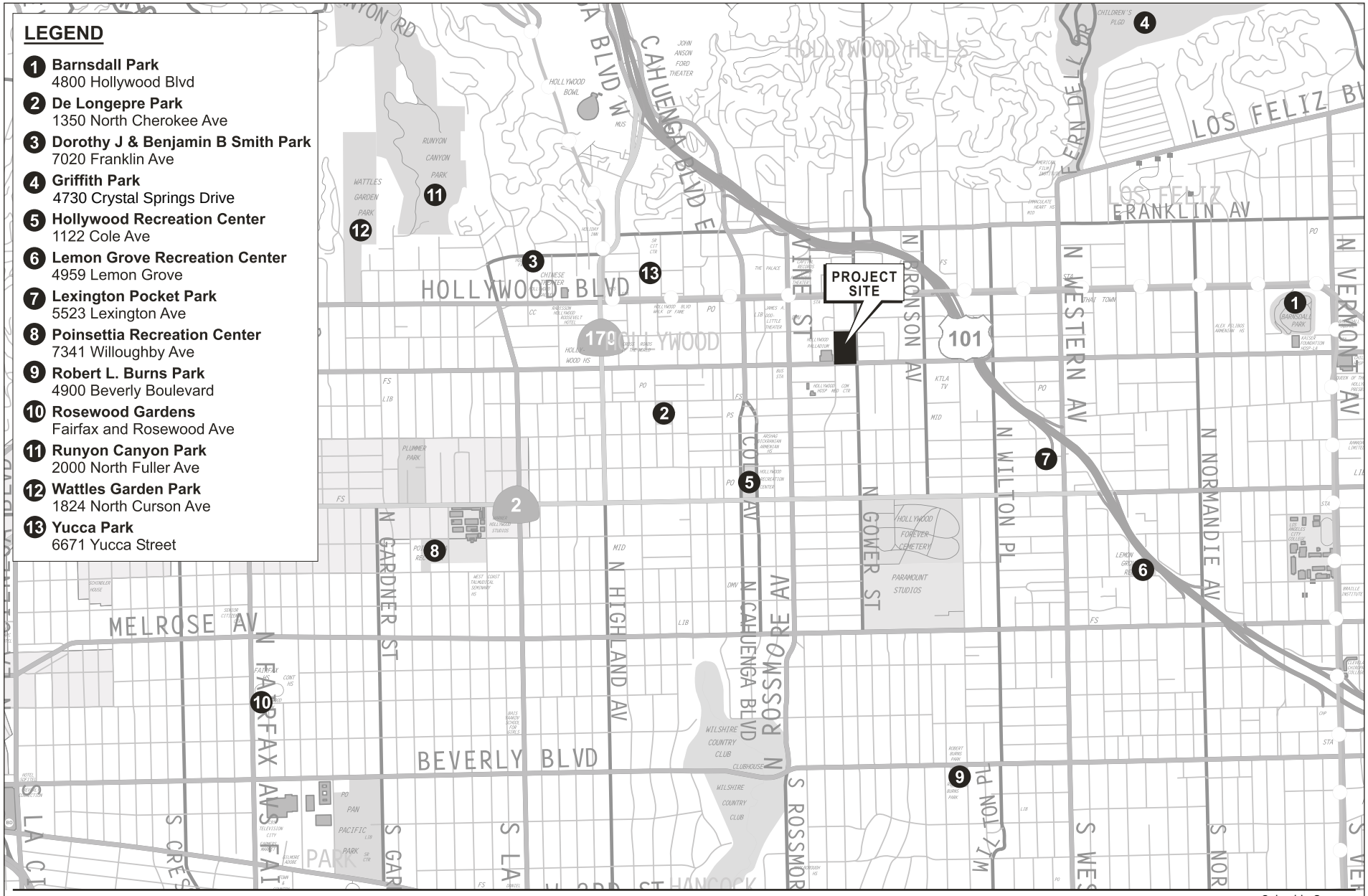
[31] *Ibid.*

Table IV.H-14
Existing Parks and Recreational Facilities Within the Project Vicinity

Map No.[a]	Facility and Address	Distance from Project Site[b]	Size (acres)	Type of Park	Amenities
1	**Barnsdall Park** 4800 Hollywood Blvd.	1.6 miles	14.90	Community	Barnsdall Art Center, Gallery Theater, Hollyhock House, Junior Art Center, Municipal Art Gallery
2	**De Longpre Park** 1350 N. Cherokee Ave.	0.60 mile	1.38	Neighborhood	Children' play area, benches
3	**Dorothy J & Benjamin B Smith Park** 7020 Franklin Ave.	1.1 miles	0.50	Small	Benches
4	**Griffith Park** 4730 Crystal Springs Dr.	1.5 miles	4,217.87	Regional	Natural area, tennis courts, picnic and sports areas, hiking and equestrian trails, Griffith Observatory, Greek Theatre, Travel Town, Los Angeles Zoo, Gene Autry Museum, Pony and Train rides, golf courses
5	**Hollywood Recreation Center** 1122 Cole Ave.	0.5 mile	2.95	Neighborhood	Auditorium, lighted outdoor basketball courts, children's play area, community room, multipurpose sports field, pool
6	**Lemon Grove Recreation Center** 4959 Lemon Grove	11 miles	3.84	Neighborhood	Auditorium, lighted baseball diamond, lighted outdoor basketball courts, children's play area, picnic tables, batting cages, jogging path, stage, TV area
7	**Lexington Pocket Park** 5523 Lexington Ave.	0.8 mile	0.51	Small	Children's play area, picnic tables, benches
8	**Poinsettia Recreation Center** 7341 Willoughby Ave.	1.5 miles	6.21	Community	Lighted baseball diamond, lighted indoor and outdoor basketball courts, children's play area, lighted handball courts, indoor gym, lighted tennis courts, stage.
9	**Robert L. Burns Park** 4900 Beverly Blvd.	1.4 miles	1.68	Neighborhood	Children's play area, picnic tables.
10	**Rosewood Gardens** Fairfax and Rosewood Ave.	2.2 miles	0.03	Small	Garden.
11	**Runyon Canyon Park** 2000 N. Fuller Ave.	1.5 miles	134	Community	Children's play area, hiking trail, off-leash dog area.
12	**Wattles Garden Park** 1824 N. Curson Ave.	1.8 miles	48.16	Community	Community garden, hiking trails, Japanese garden, mansion, stream/brook, tea house.
13	**Yucca Park** 6671 Yucca St.	0.7 miles	0.66	Neighborhood	Barbeque pits, lighted basketball courts, children's pay area, lighted handball courts, picnic area, lighted soccer field, benches.

[a] *The map numbers correspond with Figure IV.H-6 on page IV.H-57.*
[b] *Distances represent crow-fly distances (shortest line between the boundaries of the project site and parks).*

Source: City of Los Angeles Department of Recreation and Parks, Correspondence Letter dated July 26, 2007; Matrix Environmental, 2009.



Columbia Square

matrix environmental

Figure IV.H-6
Parks and Recreational Facilities Located within the Project Vicinity

Source: Matrix Environmental, 2009

c. Project Design Features

The project would provide substantial open space, landscaping and amenities for project residents, guests and tenants, as well as for the general public. Publicly accessible landscaped open space would consist of two public courtyards and a pocket park located on the ground level. One of the public courtyards would consist of the existing courtyard (the Sunset Courtyard) fronting Sunset Boulevard that is a part of the Columbia Square Complex. As part of the project, this courtyard would be renovated, re-landscaped, and reintroduced as a new pedestrian-oriented amenity for the greater community. More specifically, the new Sunset Courtyard would connect to other green spaces on-site and create a walkable district, enabling residents and visitors to walk through and enjoy a vast majority of the project site. The second courtyard would be located at the northwest corner of the site and would be enhanced with pedestrian pathways and accent paving. The pocket park would be located in the northeast corner of the project site (at the corner of Selma Avenue and Gower Street). Additional amenities for project residents and/or guests would include fitness and recreation rooms, large central courtyards and gardens on the podium level, two swimming pools, entertaining patios, sunning areas, and landscaped recreational areas. Overall, the project would provide a total of approximately 76,400 square feet of open space consisting of approximately 59,000 square feet of active and passive public/common open space and approximately 17,400 square feet of private open space (comprised of balconies) amounting to approximately 40 percent of the project site.[32] The project would create a walkable community, enabling residents and visitors to walk through and enjoy the project site.

Landscaping including ornamental trees would be provided along the perimeter of the site as well along pedestrian walkways integrated throughout the project site. A minimum of 25 percent of the common open space would be planted with ground cover, shrubs, or trees in accordance with LAMC requirements. In addition, the courtyard along Sunset Boulevard, as well as the podium level adjacent to the two proposed pools would be landscaped. The ground level of nearly all of the buildings provides pedestrian links to the surrounding environs, as well as to the interior common recreation areas. Multiple access points and a mix of landscaped public and private open space, including several large courtyards and the pocket park, would connect and integrate all elements of the project. Pathways would be defined and open to pedestrians traversing the block or connecting to elements within it. The proposed landscape plans would provide for an

[32] *Open space is based on the definition of open space provided in Section 12.21 of the LAMC and includes common and private open space areas. Please refer to Section IV.G.5, Parks and Recreation, for further discussion.*

estimated 19 percent increase in landscaped area on-site compared to existing conditions, thereby increasing green space and pervious surface area.[33]

d. Analysis of Project Impacts

(1) Public Recreation Plan

As discussed above, the PRP sets forth the desired long-range (minimum) standards of two acres per 1,000 persons (0.002 acre per person) for neighborhood parks with a service radius of 0.5 mile and two acres per 1,000 persons (0.002 acre per person) for community parks with a service radius of 2.0 miles. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and therefore, includes more attainable short and intermediate-range standards of one acre per 1,000 persons (0.001 acre per person) for neighborhood parks with a service radius of 1.0 mile and one acre per 1,000 persons (0.001 acre per person) for community parks with a service radius of 2.0 miles.

As indicated in Section IV.K, Population, Housing, and Employment of this Draft EIR, the project would generate approximately 908 new residents. Thus, in order to meet the PRP's long-range standard for neighborhood parks, the project would be required to provide 1.8 acres of neighborhood parks. To meet the more realistic short and intermediate-range standard, the project would be required to provide 0.9 acre of neighborhood parkland. As previously stated, the project would include 59,000 square feet (approximately 1.35 acres) of common open space which would be fully accessible to project residents. Thus, this common open space area would be considered "neighborhood park" space, as it would exclusively serve project residents and the "immediate neighbors" of the residential development. The project would thus, exceed the short and intermediate-range standards. However, the project would fall short of the long-range standard for neighborhood parks by 0.45 acres. As previously stated above, the PRP has noted that the long-range standards may not be reached during the life of the plan, and, therefore, the short and intermediate-range standards should be consulted for guidance.

[33] *This increase takes into account landscaping/pervious open space both on the ground level (22,210 square feet or approximately 11 percent of the lot area) and the podium level (19,970 square feet or approximately 10 percent of the lot area), for a project total of 42,180 square feet of potentially pervious landscaping or approximately 21 percent of the total project site area. The project site currently includes 1.8 percent of pervious landscaping. Thus, the project would result in an estimated 19 percent increase in landscaped area on-site.*

The project's provision of on-site open space would help reduce the use of off-site community parks in the area. Nonetheless, project residents would still be expected to utilize the community parks' amenities including sports fields, tennis courts, basketball courts, and children's play areas. The project, therefore, would not meet the PRP's long range standard or short and intermediate range standards for community parks. With the implementation of the proposed mitigation, the project would comply with the parks and recreational requirements set forth by the City.

(2) Los Angeles Municipal Code

As discussed above, pursuant to Section 12.21 of the LAMC, the project would be required to provide 100 square feet of usable open space for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. The project would consist of 185 one-bedroom units (two habitable rooms), 186 two-bedroom units (three habitable rooms), and 29 three-bedroom units (four habitable rooms). As shown in Table IV.H-15 on page IV.H-61, to meet the open space requirements of Section 12.21, the project would be required to provide 46,825 square feet of usable open space based on the number and type of units proposed. Of this amount, at least 23,413 square feet (50 percent) must be common open space area. Furthermore, of the 23,413 square feet of required common open space, a minimum of 5,853 square feet (25 percent) must be planted with ground cover, shrubs, or trees.

As discussed above, the project would provide a total of 76,400 square feet (approximately 1.75 acres) of usable open space consisting of 59,000 square feet of common open space and 17,400 square feet of private open space. The 59,000 square feet of common open space would consist of an 18,400-square-foot public plaza and courtyard located on the ground level, an approximately 3,000-square-foot pocket park located on the ground level, and 37,600 square feet of large central courtyards and gardens on the podium level. As such, the project would meet and exceed the 46,825 square feet of total usable open space required by Section 12.21 of the LAMC. In addition, a minimum of 25 percent of the common open space would be planted to meet the LAMC requirement of planted common open space. Additionally, the project would provide approximately 17,400 square feet of private space consisting of balconies and small yards, which would be contiguous to dwelling units. Thus, based on the above, the project would not conflict with the open space requirements of Section 12.21 of the LAMC.

The project would also be subject to the parkland dedication requirements of Section 17.12 of the LAMC. Section 17.12 of the LAMC, enacted pursuant to the Quimby Act, sets forth a formula for new development to satisfy park and recreational demand through parkland dedication and/or the payment of in-lieu fees (as subject to determination by the DRP). The area of land required for parkland dedication is based on the maximum

Table IV.H-15
City of Los Angeles Section 12.21 Park Space Calculations

Open Space Required	Quantity Proposed	Requirement/Unit	Total Requirement
Studio (less than 3 habitable rooms)	0	100 sf	0
1-Bedroom DU (less than 3 habitable rooms)	185	100 sf	18,500
2-Bedroom DU (3 habitable rooms)	186	125 sf	23,250
3-Bedroom DU (greater than 3 habitable rooms)	29	175 sf	5,075
	TOTAL OPEN SPACE REQUIRED		**46,825 sf**
Open Space (Common and Private) Provided	**Quantity Proposed**	**Size/Unit**	**Total Provided**
Common Open Space			
Public Courtyard (NW) corner of site) - ground level	1	3,000 sf	3,000 sf
Public Courtyard (Sunset Courtyard)- ground level	1	18,400 sf	18,400 sf
Recreation areas - podium level	1	37,600 sf	37,600 sf
	Total Common Space Provided		*59,000 sf*
Private Open Space			
Balconies/yards	-	- sf	17,400 sf
	Total Private Space Provided		*17,400 sf*
	TOTAL OPEN SPACE PROVIDED		**76,400 sf**

Source: Matrix Environmental, 2009.

density permitted within the zone where a development is located. The project site is seeking to change the existing [Q]C4-1VL-SN zone to the C4-2-SN zone. Per the LAMC, residential development in a C4 zone is permitted to be developed to a R4 zoning density. For a R4 zone, one dwelling unit per 400 square feet of lot area is permitted. Therefore, the site is permitted to develop a maximum density of over 100 dwelling units per acre. According to Section 17.12, for projects at this density, the project would be required to dedicate 32 percent of the project site's gross subdivision area (4.68 acres or 203,861 square feet) as parkland. Thus, the project would be required to dedicate 65,236 square feet (1.50 acres) of land. As discussed above, the project would provide 59,000 square feet (1.35 acres) of common open space. However, this land would not be dedicated as required to satisfy Section 17.12 requirements but rather would be owned and maintained by the Project Applicant. The project's 59,000 square feet of common open space could be credited against the total parkland dedication requirement or the total in-lieu park fee requirement, as determined by the DRP. With implementation of the recommended mitigation measure below, the project would comply with the parkland dedication requirements of LAMC Section 17.12 through the development of additional recreational and park amenities, payment of in-lieu fees to improve existing facilities in the park area, or through a combination of these methods.

4. Cumulative Impacts

Section III, Environmental Setting, of this EIR provides a list of the related projects that have the potential to occur concurrent with the development of the project. Of the 94 related projects identified in Section III, 55 are residential projects or have residential components. Similar to the project, the resident population is conservatively based on the average household size for the Hollywood Community Plan area of 2.27 residents per dwelling unit. As shown in Table IV.H-16 on page IV.H-63, the related projects would potentially generate a population of approximately 25,263 residents. Therefore, the project in conjunction with the related projects would cumulatively generate a total population of 26,171 residents. In conjunction with the project, the related projects would cumulatively generate the need for additional parks and recreation facilities. However, all related projects with residential uses would be required to comply with the parks and recreation requirements of the PRP and LAMC Sections 12.21 and 17.12. Therefore, potential cumulative impacts related to parks and recreational facilities would be reduced to a less than significant level.

5. Mitigation Measures

Mitigation Measure H-6: The Project Applicant shall, at its election, in compliance with LAMC Section 17.12 requirements, do one or a combination of the following: (1) develop recreational and park amenities; (2) pay in-lieu fees to improve existing facilities in the park area; or (3) provide a combination such that the project would provide a total of three acres per 1,000 residents.

6. Level of Significance After Mitigation

Implementation of Mitigation Measure H-6 would ensure that potential significant impacts to park and recreational facilities associated with the project, based on the maximum requirements established under the PRP and LAMC Section 17.12, would be reduced to a level that is less than significant. As the project complies with the requirements set forth in LAMC Section 12.21, no mitigation measures are required relative to LAMC Section 12.21 requirements. Thus, the project would meet the demand for services as addressed through those provisions. Potential impacts to park and recreational facilities related to the project would be less than significant.

Table IV.H-16
Related Residential Projects within the Project Vicinity

Related Project No.	Project	Address	Condominiums	Apartments	Total Residential Units	Population[a]
7	Sunset Legacy Lofts	7950 Sunset Bl		183	183	415
9	Apartments & retail	5920 Melrose Av		54	54	123
10	Park La Brea Apt Addition	6300 3rd St		300	300	681
11	Mixed-Use	5600 Wilshire Bl		288	288	654
12	Mixed-Use	648 Western Av		240	240	545
13	Fairfax Av Mixed-Use	801 Fairfax Av		93	93	211
14	Apartments	5165 Fountain Av		110	110	250
15	Apartments & retail	922 Western Av		63	63	143
16	Apartments	6142 Franklin Av		130	130	295
17	Condos & retail	600 Hobart Bl	70		70	159
18	Apartments	3800 Wilshire Bl		91	91	207
19	Condos	6735 Yucca St	54		54	123
20	Apartments	6298 3rd St		300	300	681
21	Condos	1714 Mc Cadden Pl	218		218	495
24	Mixed-Use	1611 La Brea Av	180		180	409
26	Hollywood/Garfield Mixed Use	5555 Hollywood Bl		108	108	245
27	Condos	1736 Mc Cadden Pl	218		218	495
28	Mixed-Use	5400 Hollywood Bl		42	42	95
31	Mixed-Use	1717 Vine St	57		57	129
32	Mixed-Use	3670 Wilshire Bl	378		378	858
33	Desmond's Tower Res. Dev.	5500 Wilshire Bl		175	175	397
34	Mixed-Use	4500 Los Feliz Bl	80		80	182
35	Mixed-Use	450 Western Av	N/A	N/A	N/A	N/A
36	Hollywood & Vine Mixed-Use	6250 Hollywood Blvd	150	375	525	1192
37	Mixed-use	5651 Santa Monica Bl		437	437	992
41	BLVD 6200 (south) - mixed-use	6200 Hollywood Bl		952	952	2161
42	Mixed-Use	694 Hobart Bl	242		242	549
43	Mixed-use	6915 Melrose Av	13		13	30
44	Third Street Mixed-Use Project	5863 3rd St.		60	60	136
46	Sunset & Gordon Mixed-use (Old Spaghetti Factory)	5935 Sunset Bl	144		144	327
47	Sunset & Vine Mixed-Use	1538 Vine St		306	306	695
49	Argyle Lofts	1800 Argyle Av		73	73	166
51	Apts & retail (1/2 of blk Yucca &	6758 Yucca St		270	270	613

Table IV.H-16 (Continued)
Related Residential Projects within the Project Vicinity

Related Project No.	Project	Address	Condominiums	Apartments	Total Residential Units	Population[a]
	Highland & McCadden)					
52	La Brea Urban Lofts	101 La Brea Av	118		118	268
56	Condos & retail	5663 Melrose Av	96		96	218
57	HK Town Project (Mixed-Use)	100 Western Ave		187	187	424
59	Mixed-use residential and retail	3324 Wilshire Bl	108		108	245
60	Residential Development	6001 Carlton Wy	42		42	95
62	Mixed-use residential, retail and restaurant	6677 Santa Monica Blvd		787	787	1786
63	Mixed-use residential and retail	6100 Hollywood Blvd		151	151	343
64	Mixed-use	6230 Yucca St	85	10	95	216
65	Mixed-use (68 assisted-living apts w/ ret. & comm. spcs)	5245 Santa Monica Bl		68	68	154
68	Mixed-use residential and retail	6911 Santa Monica Blvd	374		374	849
69	Wilshire La Brea High Rise	5200 Wilshire Bl		332	332	754
70	Mixed-Use	3200 Beverly Bl		32	32	73
71	Hollywood Passage (Mixed-use)	5550 Hollywood Bl	216		216	490
74	Almond Tree Village	3400 3rd St	147	261	408	926
77	Mixed-Use Project	915 La Brea Av		219	219	497
78	Hollywood Production Center	1149 Gower St	36	21	57	129
83	Highland Center Mixed-Use Project	1600 N Highland Ave	496		496	1126
84	Lanewood Condos	7045 W Lanewood Ave	43		43	98
88	Condominiums	1645 Vine St	96		96	218
92	Broadstone Hollywood	7060 Hollywood Bl	130		130	295
93	Palladium	6215 Sunset Bl	170		170	386
94	Capital Records Tower	1750 Vine St		450	450	1022
				Related Projects Total	**11,129**	**25,263**
				Project Total	**400**	**908**
				CUMULATIVE TOTAL	**11,529**	**26,171**

[a] *Population is calculated based on an average household size of 2.27 persons per unit in the Hollywood Community Plan area.*

Source: Matrix Environmental, 2009.

IV. Environmental Impact Analysis

H.5 Public Services - Libraries

1. Introduction

This section describes existing library facilities and services provided by the Los Angeles Public Library (LAPL), and provide an analysis of potential impacts on these facilities and services that would occur as a result of the project. The analysis addresses available library capacity and whether it is sufficient to accommodate the population growth generated by the project. The analysis is based in part on information by LAPL.

2. Environmental Setting

a. Regulatory Framework

(1) City of Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework, adopted in December 1996 and readopted in August 2001, provides general guidance regarding land use issues for the entire City of Los Angeles and defines Citywide policies regarding land use, including infrastructure and public services. Goals and policies for the provision of adequate library services and facilities to meet the needs of the City's residents are set forth in Objectives 9.20 and 9.21. Objective 9.20 proposes to adopt a Citywide library service standard by the year 2000. Policy 9.20.1, which further supports Objective 9.20, proposes the development of library standards dealing with the facilities' net floor area, the appropriate number of permanent collection books per resident, and service radii. Policy 9.20.2 proposes a Citywide policy for locating non-English language permanent collections. Objective 9.21 proposes to ensure library services for current and future residents and businesses. Policy 9.21.3, which supports Objective 9.21, encourages the inclusion of library facilities in mixed-use structures, in community and regional centers, at transit stations, and in mixed-use boulevards. Policy 13 within the General Plan Framework Implementation Programs Chapter holds the City Department of Libraries responsible for updating the Library Master Plan as well as providing sufficient capacity to correct existing deficiencies, identifying improvements to new library facilities, developing strategies to increase the distribution of library services, establishing a new City library service standard based on the needs of the City, and identifying funding sources for facility improvements.

The implementation plans and policies set forth in the General Plan Framework have been addressed through the Los Angeles Public Library Branch Facilities Plan and the 1989 and 1998 Library Bond Programs.

(2) Los Angeles Public Library Branch Facilities Plan

The Los Angeles Public Library Branch Facilities Plan (Facilities Plan) guides the construction of branch libraries and specifies standards for the size and features of branch facilities based on the population served in each community. The Facilities Plan also outlines the required facilities expansion needs of the libraries within the City. The Facilities Plan was revised and recently approved by the Board of Library Commissioners on February 8, 2007. Under the 2007 Facilities Plan, the service population for a branch library is defined according to the size of the facility, as shown in Table IV.H-17 on page IV.H-67. LAPL bases the service population for a branch upon census tracts that are assigned to that branch. The Facilities Plan has been implemented with bond measures within two phases, the 1989 Bond Program and the 1998 Bond Program.

In 1989, City of Los Angeles voters approved Proposition 1, a $53.4 million Branch Library Facilities Bond, also known as the 1989 Library Bond Issue. Under Proposition 1, the Facilities Plan proposed to obtain new sites for building, renovating, and expanding libraries that were unable to serve the community sufficiently and/or were damaged by the Whittier earthquake. LAPL also successfully obtained additional funds from the Community Development Block Grant Award of federal funds from the California State Library Proposition 85, as well as from Friends of the Library groups, for a total branch construction program of $108 million. Under the 1989 Bond Program, 29 libraries were built.

On November 3, 1998, Los Angeles voters approved Proposition DD, also known as the 1998 Library Facilities Bond, a $178.3 million bond for funding the construction, renovation, improvement, or expansion of 32 new branch libraries. As a result of effective project management, four additional projects were added to the scope of the overall facilities program. Of the 36 total projects, 18 existing library facilities were replaced with 18 new library facilities on the existing City-owned sites, nine libraries were constructed on newly acquired sites, five new libraries were constructed on acquired sites in communities that previously did not have library services, and with the four additional projects, existing libraries were renovated and expanded. As of August 2008, the original 32 projects are complete, and of the four newly added projects, three projects are complete, and one is under construction.[34]

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[34] *Los Angeles Public Library website, Summary of Branch Facilities Plan Revision, accessed March 12, 2008.*

Table IV.H-17
City of Los Angeles Public Library Branch Building Size Standards

Population Served	Size of Facility
Below 45,000	12,500 square feet
Above 45,000	14,500 square feet [a]
Regional Branch	Up to 20,000 square feet

[a] *For a community with population above 90,000, consider adding a second branch to serve the area.*

Source: Los Angeles Public Library website, http://www.lapl.org/about/Branch_Facilities_Criteria.pdf, accessed July 25, 2007.

b. Existing Conditions

The LAPL system provides library services to the City of Los Angeles. LAPL consists of the Central Library and 71 branch libraries, with a multimedia inventory of over 6.3 million items and 2,200 computer workstations with access to the internet and electronic databases. All branch libraries provide free access to computer workstations that are connected to the Library's information network. In addition to providing internet access, these workstations enable the public to search LAPL's electronic resources including the online catalog, over 100 subscription databases, word processing, language learning, literacy, and a large collection of historic documents and photographs. In addition, specially designed websites are provided for children, teens, and Spanish speakers.

LAPL is a member of the Metropolitan Cooperative Library System (MCLS), an association of public libraries in the greater Los Angeles area that shares resources to improve library service to the residents of all participating jurisdictions. Participation in this association enables individuals to use their library cards in multiple jurisdictions, and allows for member libraries to receive compensation for such use.

As shown in Figure IV.H-7 on page IV.H-68, there are three libraries located in the vicinity of the project site, the Frances Howard Goldwyn Hollywood Regional Branch Library, the Will and Ariel Durant Branch Library, and the John C. Fremont Branch Library. The Frances Howard Goldwyn Hollywood Regional Branch Library at 1623 N. Ivar Avenue is located approximately 0.5 mile east of the project site and the Will and Ariel Durant Branch Library at 7140 W. Sunset Boulevard is located approximately 1.3 miles east of the project site. The John C. Fremont Branch Library, located at 6121 Melrose Avenue, is approximately 1.6 miles southwest of the project site.

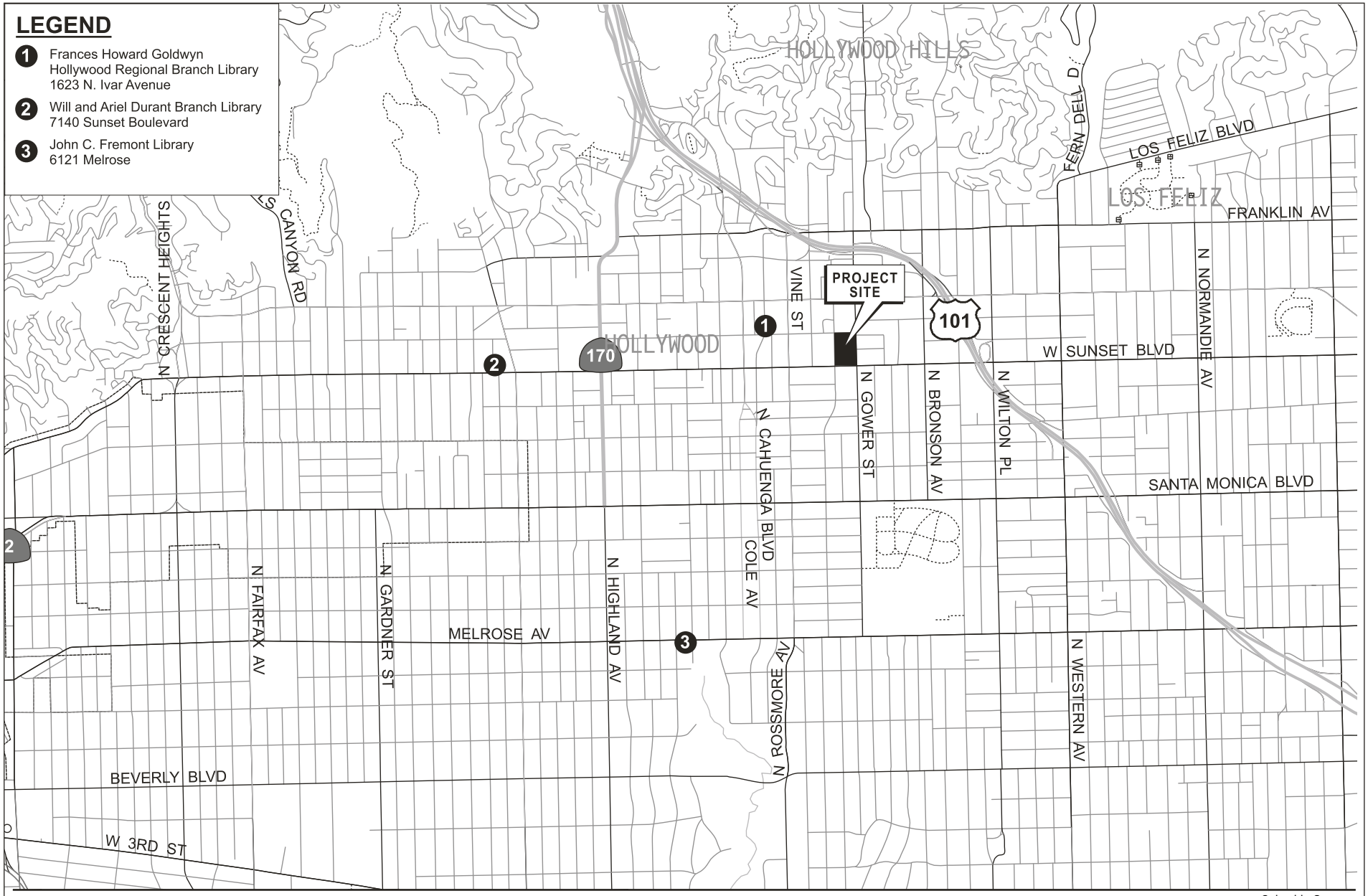

Figure IV.H-7
Libraries Located in the Vicinity of the Project Site

Source: Matrix Environmental, 2009

The Frances Howard Goldwyn Hollywood Regional Branch Library is a 19,000 square-foot regional branch, which underwent a major renovation in 2005-2006. This library serves a current population of 83,173 people and maintains 20 staff positions and a total of 193,000 volumes. As discussed above, the 2007 Facilities Plan sets forth a facility size standard of 14,500 square feet for libraries with a service population above 45,000 people and up to 20,000 square feet for a regional branch. The Frances Howard Goldwyn Hollywood Regional Branch Library meets both criteria. According to LAPL, the Frances Howard Goldwyn Hollywood Regional Branch Library adequately meets the current demand for library services.[35]

The Will and Ariel Durant Branch Library is a 12,500-square-foot branch library, which was constructed in 2003-2004, serves a current population of 33,048 people.[36] The library maintains 9 staff positions and 57,311 volumes. As discussed above, the 2007 Facilities Plan sets forth a size standard of 12,500 square feet for libraries with a service population below 45,000 people. The Will and Ariel Durant Branch Library meets this criteria and the current demand for library services.[37]

The John C. Fremont Branch Library serves a population of approximately 25,100 people.[38] This library has seven staff positions and 37,000 volumes. Based on its size of 7,361 square feet, this library does not meet the LAPL criteria and the current demand for library services.[39]

3. Project Impacts

a. Methodology

Potential project impacts on library services and facilities are determined based on identifying the primary service library or libraries that serve the project site, identifying the population within the library's service area, forecasting the number of residents generated by the project, combining the project's resident population with the service area population, and comparing the combined population to the service population for the library as defined by LAPL.

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[35] *Fax communication with Rona Berns, Library Facilities Division, LAPL, May 18, 2007.*

[36] *Verbal communication with Rona Berns, Library Facilities Division, LAPL, July 25, 2007.*

[37] *Ibid.*

[38] *City of Los Angeles, Draft Environmental Impact Report for The Lexington Project, June 2008.*

[39] *Ibid.*

b. Significance Thresholds

Based on the *City of L.A. CEQA Thresholds Guide (2006)*, the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project.
- The demand for library services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition, or relocation) and the project's proportional contribution to the demand.
- Whether the project includes features that would reduce the demand for library services (i.e., on-site library facilities or direct support to LAPL).

c. Analysis of Project Impacts

As analyzed in Section IV.K, Population Housing, and Employment of this Draft EIR, development of the project would generate approximately 908 new residents. As the closest library to the project site, it is anticipated that project residents would primarily utilize the Frances Howard Goldwyn Regional Branch Library. This 19,000-square-foot regional branch, which underwent a major renovation in 2005-2006, serves a current population of 83,173 people.

Build-out of the project is anticipated to occur in 2013. According to LAPL, by year 2010, the population of the Frances Howard Goldwyn Regional Branch Library service area will reach 91,980. As discussed above, the 2007 Facilities Plan recommends adding a second branch when the community reaches a service population above 90,000 people. Therefore, even without the new residents of the project, the Frances Howard Goldwyn Hollywood Regional Branch Library would exceed the recommended service population by 2010. Additionally, when applying the LAPL size criterion on a per capita basis, the LAPL size criterion equates to approximately 0.278 square feet per person (12,500 square feet ÷ 45,000 people). As indicated above, the project would generate an estimated 908 residents. Based on the size criterion of 0.278 square feet per capita, the project would result in a need for an additional 252 square feet of library space. This need would thus be nominal, representing two percent of the library's current size. Furthermore, it is not practical for libraries to add small increments of space due to demand attributable to new development projects. To achieve appropriate economies of scale, libraries are usually expanded when cumulative increases in demand justify major additions, as with the 1989 and 1998 bond programs described above.

Furthermore, it is expected that project residents would also utilize the Will and Ariel Durant Branch Library or the John C. Fremont Branch Library due to their proximity to the project site (1.3 miles and 1.6 miles respectively). The 12,500-square-foot Will and Ariel Durant Branch Library serves a current population of 33,048 people. Based on the LAPL, this library meets the LAPL size criteria and demand for library services. According to LAPL, in 2010 the population of this area will reach 36,415. As discussed above, the 2007 Facilities Plan would not require the expansion of this facility until the service population exceeds 45,000 people. Therefore, in 2010, this library is anticipated to have the ability to accommodate an additional 8,585 residents before exceeding its recommended service population. The population of this area is not likely to increase beyond an additional 8,585 residents by 2013 (build-out year of the project) even with the addition of the project's 908 new residents from the project (worst-case scenario as many of the project residents are anticipated to utilize the Frances Howard Goldwyn Regional Branch Library). The John C. Fremont Branch Library would also be available for use by project residents. Thus, the availability of these libraries would help in reducing the project's demand on the Frances Howard Goldwyn Regional Branch Library. Therefore, the project would have a less than significant impact on libraries

It should also be noted that the project would generate revenue to the City's general fund in the form of net new property tax, direct (i.e., from on-site commercial uses) and indirect (i.e., from household spending) sales tax, utility user's tax, gross receipts tax, real estate transfer tax on residential initial sales and annual resales, and other miscellaneous household-related taxes (e.g., parking fines). This revenue could be used to fund LAPL expenditures as necessary to offset the project's incremental impact on library services.

4. Cumulative Impacts

Section III, Environmental Setting, of this EIR identifies 94 related projects that are anticipated to be developed within the vicinity of the project site. Of these related projects, 55 include the development of residential uses. As shown in Table IV.H-18 on page IV.H-72, the 55 residential projects would develop a total of 11,129 residential units and generate an estimated population of approximately 25,263 people.[40] When including the project's estimated 908 residents, a cumulative total of approximately 26,171 new residents would be generated within the project area. If all 26,171 new residents utilized the Frances Howard Goldwyn Hollywood Regional Branch Library, cumulative development would further cause this library to exceed its target population based on its size criteria.

[40] *Ibid.*

Table IV.H-18
Related Residential Projects Within General
Service Area of Libraries Serving the Project Site

Related Project No.	Project	Address	SFA	MF	Total Residential Units	Population
7	Sunset Legacy Lofts	7950 Sunset Blvd		183	183	415
9	Apartments & retail	5920 Melrose Ave		54	54	123
10	Park La Brea Apt Addition	6300 3rd Street		300	300	681
11	Mixed-Use	5600 Wilshire Blvd		288	288	654
12	Mixed-Use	648 Western Ave		240	240	545
13	Fairfax Av Mixed-Use	801 Fairfax Ave		93	93	211
14	Apartments	5165 Fountain Ave		110	110	250
15	Apartments & retail	922 Western Ave		63	63	143
16	Apartments	6142 Franklin Ave		130	130	295
17	Condos & retail	600 Hobart Blvd	70		70	159
18	Apartments	3800 Wilshire Blvd		91	91	207
19	Condos	6735 Yucca Street	54		54	123
20	Apartments	6298 3rd Street		300	300	681
21	Condos	1714 Mc Cadden Pl	218		218	495
24	Mixed-Use	1611 La Brea Ave	180		180	409
26	Hollywood/Garfield Mixed Use	5555 Hollywood Blvd		108	108	245
27	Condos	1736 Mc Cadden Pl	218		218	495
28	Mixed-Use	5400 Hollywood Blvd		42	42	95
31	Mixed-Use	1717 Vine Street	57		57	129
32	Mixed-Use	3670 Wilshire Blvd	378		378	858
33	Desmond's Tower Res. Dev.	5500 Wilshire Blvd		175	175	397
34	Mixed-Use	4500 Los Feliz Blvd	80		80	182
35	Mixed-Use	450 Western Ave	N/A	N/A	N/A	N/A
36	Hollywood & Vine Mixed-Use	6250 Hollywood Blvd	150	375	525	1192
37	Mixed-use	5651 Santa Monica Blvd		437	437	992
41	BLVD 6200 (south) - mixed-use	6200 Hollywood Blvd		952	952	2161
42	Mixed-Use	694 Hobart Blvd	242		242	549
43	Mixed-use	6915 Melrose Ave	13		13	30
44	Third Street Mixed-Use Project	5863 3rd Street		60	60	136
46	Sunset & Gordon Mixed-use (Old Spaghetti Factory)	5935 Sunset Blvd	144		144	327
47	Sunset & Vine Mixed-Use	1538 Vine Street		306	306	695
49	Argyle Lofts	1800 Argyle Ave		73	73	166
51	Apts & retail (1/2 of blk Yucca & Highland & McCadden)	6758 Yucca Street		270	270	613
52	La Brea Urban Lofts	101 La Brea Ave	118		118	268
56	Condos & retail	5663 Melrose Ave	96		96	218
57	HK Town Project (Mixed-Use)	100 Western Ave		187	187	424
59	Mixed-use residential and retail	3324 Wilshire Blvd	108		108	245
60	Residential Development	6001 Carlton Wy	42		42	95

Table IV.H-18 (Continued)
Related Residential Projects Within General
Service Area of Libraries Serving the Project Site

Related Project No.	Project	Address	SFA	MF	Total Residential Units	Population
62	Mixed-use residential, retail and restaurant	6677 Santa Monica Blvd		787	787	1,786
63	Mixed-use residential and retail	6100 Hollywood Blvd		151	151	343
64	Mixed-use	6230 Yucca Street	85	10	95	216
65	Mixed-use (68 assisted-living apts w/ ret. & comm. spcs)	5245 Santa Monica Blvd		68	68	154
68	Mixed-use residential and retail	6911 Santa Monica Blvd	374		374	849
69	Wilshire La Brea High Rise	5200 Wilshire Blvd		332	332	754
70	Mixed-Use	3200 Beverly Blvd		32	32	73
71	Hollywood Passage (Mixed-use)	5550 Hollywood Blvd	216		216	490
74	Almond Tree Village	3400 3rd Street	147	261	408	926
77	Mixed-Use Project	915 La Brea Ave		219	219	497
78	Hollywood Production Center	1149 Gower Street	36	21	57	129
83	Highland Center Mixed-Use Project	1600 N Highland Ave	496		496	1126
84	Lanewood Condos	7045 W Lanewood Ave	43		43	98
88	Condominiums [a]	1645 Vine Street	96		96	218
92	Broadstone Hollywood [a]	7060 Hollywood Blvd	130		130	295
93	Palladium [b]	6215 Sunset Blvd	170		170	386
94	Capital Records Tower [c]	1750 Vine Street		450	450	1,022
				Related Project Total	**11,129**	**25,263**
				Project Total	**400**	**908**
				CUMULATIVE TOTAL	**11,529**	**26,171**

Source: Matrix Environmental, 2009.

However, it is unlikely that all residents from the related projects would attend only this library as the Will and Ariel Durant Branch Library and the John C. Fremont Branch Library would also be available. Furthermore, it is expected that each project would be reviewed on a project-by-project basis and would be expected to coordinate with the LAPL. In addition, related projects could also generate revenue to the City's general fund in the form of property taxes, sales taxes, etc. This revenue could be used to fund LAPL expenditures as necessary to offset cumulative impacts on library services. Therefore, cumulative impacts to libraries would be less than significant.

5. Mitigation Measures

Impacts to libraries would be less than significant. Therefore, no mitigation measures would be required.

6. Level of Significance After Mitigation

As indicated above, impacts to libraries would be less than significant, and thus, no mitigation measures would be required.

IV. Environmental Impact Analysis

I. Transportation and Circulation

1. Introduction

This section of the Draft EIR analyzes the potential impacts associated with traffic, access, and parking. Information for the analysis is based on the Traffic Study for the Columbia Square Mixed-Use Project prepared by Fehr & Peers dated May 2009. This report is included in Appendix I of this Draft EIR. The City of Los Angeles Department of Transportation (LADOT) reviewed and approved the Traffic Study prior to circulation of this Draft EIR.

2. Environmental Setting

a. Existing Conditions

(1) Local and Regional Access

The project site is located within the Hollywood Community Plan area of the City of Los Angeles. Local access is provided by Sunset Boulevard, El Centro Avenue, Selma Avenue, and Gower Street, which bound the project site to the south, west, north, and east, respectively.

Primary regional access to the project site is provided by Vine Street, Hollywood Boulevard, and US-101 (or the Hollywood Freeway), which generally runs in a southeast-northwest direction approximately three-tenths of a mile north and four-tenths of a mile east of the project site. Project access from US-101 is available via southbound off-ramps at the intersection of Vine Street and Franklin Avenue, the intersection of Gower Street and Yucca Street, and on Hollywood Boulevard east of Bronson Avenue; and via two northbound off-ramps near the intersection of Franklin Avenue and Gower Street. US-101 access from the project site is available via northbound on-ramps at the intersection of Argyle Avenue and Franklin Avenue, and on Hollywood Boulevard west of Van Ness Avenue; and via southbound on-ramps on Argyle Avenue north of Yucca Street. Regional access to the project site is also provided by Cahuenga Boulevard, which runs in a north-south direction west of the project site; Vine Street, which runs in a north-south direction east of the project site; Sunset Boulevard, which runs in an east-west direction on the

southern edge of the project site; and Hollywood Boulevard, which runs in an east-west direction north of the project site.

The following is a brief description of the streets that serve the project site:

- Sunset Boulevard is an east-west Major Highway Class II on the southern edge of the project site. Sunset Boulevard provides six travel lanes with three lanes in each direction during the weekday peak hours. The parking lane is a travel lane from 7:00 to 9:00 A.M. and 4:00 to 6:00 P.M. Otherwise parking is allowed on both sides of the street. The posted speed limit is 35 miles per hour (mph).

- El Centro Avenue is a local roadway that runs in the north-south direction on the western edge of the project site. It provides one travel lane in each direction. El Centro Avenue provides direct local access to the project site. Parking is permitted on both sides of the street between Santa Monica Boulevard and Sunset Boulevard and restricted on both sides of the street between Sunset Boulevard and Selma Avenue. The posted speed limit is 25 mph.

- Selma Avenue is an east-west local roadway on the northern edge of the project site. It provides one travel lane in each direction. Selma Avenue provides local access to the project site. Parking is limited on both sides of the street in the project area. The posted speed limit is 25 mph.

- Gower Street is a secondary arterial that runs in a north-south direction on the eastern edge of the project site. South of Sunset Boulevard, Gower Street provides two travel lanes, one in each direction. It provides three travel lanes, with two northbound lanes and one southbound, between Sunset Boulevard and Hollywood Boulevard. It widens to four travel lanes, two lanes in each direction, between Hollywood Boulevard and Franklin Avenue. Gower Street provides direct local access to the project site as well as regional access through a connection to the US-101 westbound off-ramp near the intersection of Franklin Avenue and Gower Street. Parking is limited on both sides of the street between Hollywood Boulevard and Yucca Street and restricted on both sides of the street between Yucca Street and Franklin Avenue. The posted speed limit is 30 mph.

- Vine Street is a north-south Major Highway Class II that provides four travel lanes with two lanes in each direction. Vine Street provides local access to the project site as well as regional access through a connection to the US-101 southbound off-ramp at the intersection of Franklin Avenue and Vine Street. Parking is limited from 8:00 A.M. to 6:00 P.M. on both sides of the street between Franklin Avenue and Hollywood Boulevard. The posted speed limit is 35 mph.

- Hollywood Boulevard is an east-west Major Highway Class II that provides four travel lanes with two lanes in each direction. Hollywood Boulevard provides local access to the project vicinity as well as regional access through a connection to the US-101 ramps at Hollywood Boulevard east of Bronson Avenue. Parking is

limited from 8:00 A.M. to 6:00 P.M. on both sides of the street between Cahuenga Boulevard and the US-101 ramps. The posted speed limit is 35 mph.

- Cahuenga Boulevard, which runs in a north-south direction to the west of the project site, is a secondary arterial south of Franklin Avenue. It provides four travel lanes, two lanes in each direction. It provides both local and regional access to the project site through a connection to the US-101 ramps. Parking is limited on both sides of the street in the project area. The posted speed limit is 35 mph.

- Franklin Avenue is an east-west secondary arterial. It widens to four lanes, with two lanes in each direction, east of Cahuenga Boulevard in the project area. Parking is mostly limited on both sides of the street between Highland Avenue and Bronson Avenue. The posted speed limit is 35 mph.

- Argyle Avenue is a local roadway that runs in a north-south direction to the west of the project site. It widens to four travel lanes, with two lanes in each direction, between Hollywood Boulevard and Yucca Street and narrows again to three travel lanes, with one northbound lane and two southbound lanes, between Yucca Street and Franklin Avenue. Argyle Avenue provides indirect local access to the project site as well as regional access through a connection to the US-101 ramps. Parking is limited on both sides of the street between Hollywood Boulevard and Franklin Avenue. The posted speed limit is 30 mph.

(2) Public Transit Service

The Los Angeles County Metropolitan Transportation Authority (Metro) and LADOT Downtown Area Shuttle (DASH) system provide public transit service in the vicinity of the project site. Specifically, Metro operates the Metro Red Line, a heavy rail subway that travels from Union Station in downtown Los Angeles to North Hollywood. This line travels below Hollywood Boulevard in the project area and has a station (Hollywood and Vine Station) within walking distance (less than 0.5 mile) of the project site at the southwest corner of Hollywood Boulevard and Argyle Avenue. Metro also provides approximately 12 bus lines that include local service, east-west service, north-south service, limited-stop service, and Metro Rapid service along three roadways in the vicinity of the project site (Sunset Boulevard, Hollywood Boulevard, and Vine Street). LADOT's DASH system provides approximately three shuttle routes along four roadways in the vicinity of the project site (Sunset Boulevard, El Centro Avenue, Gower Street, and Hollywood Boulevard). Refer to the Traffic Study in Appendix I for a detailed description of the existing public transit service lines and routes that serve the project vicinity.

(3) Parking

Parking for existing uses on the project site is provided via an asphalt-paved surface parking lot located primarily on the northern half of the project site. The project site's existing parking is generally used by on-site tenants and their guests. The existing parking lot contains approximately 374 parking spaces.

(4) Levels of Service

(a) Intersections

In consultation with LADOT as well as members of the community, a total of 27 intersections in the vicinity of the project site were selected for analysis in the Traffic Study. The 27 study intersections are listed in Table IV.I-1 on page IV.I-5. As shown in Table IV.I-1, a total of 20 of the study intersections are signalized, while six study intersections are stop-controlled, and one study intersection is uncontrolled. All of the signalized intersections are controlled by the City's Automatic Traffic Surveillance and Control System (ATSAC), as well as the City's Automated Traffic Control System (ATCS). Figure IV.I-1 on page IV.I-6 depicts the location of the study intersections.

Existing 2008 traffic volumes for the 27 study intersections were established in one of three ways: 1) via traffic counts conducted in March, May, and June of 2008 during the A.M. and P.M. peak hours; 2) via traffic counts conducted in January, March, and June of 2007 which were then increased by 1 percent to reflect 2008 conditions; or3) via traffic volumes contained in previous traffic studies conducted in 2005 and 2006 which were then increased by 1 percent per year to reflect 2008 conditions. Table IV.I-1 lists the traffic volume collection method utilized for each study intersection. Figure IV.I-2 on page IV.I-7 depicts the existing 2008 traffic volumes at each study intersection for both the A.M. and P.M. peak hours.

The City of Los Angeles utilizes critical movement analysis (CMA) methodology to evaluate traffic conditions at signalized intersections. The CMA methodology determines the intersection volume-to-capacity (V/C) ratio. The stop-controlled and uncontrolled intersections were analyzed using the CMA methodology and a reduced capacity of 1,200 vehicles per hour per lane. The intersection V/C ratio or delay is then assigned a level of service (LOS) rating to describe intersection operations (i.e., degree of congestion). LOS varies from LOS A to LOS F. LOS A through LOS D are generally considered acceptable levels while LOS E and F are generally considered unsatisfactory levels.

Table IV.I-1
Study Intersections

No.	Intersection	Traffic Control[a]	Traffic Volume Collection Method
1	Cahuenga Blvd. & Sunset Blvd.	Signalized	2008 traffic counts
2	Vine St./Franklin Ave. & US-101 southbound off-ramp	Signalized	2008 traffic counts
3	Vine St. & Hollywood Blvd.	Signalized	2008 traffic counts
4	Vine St. & Selma Ave.	Signalized	Previous 2005 traffic study[c]
5	Vine St. & Sunset Blvd.	Signalized	2008 traffic counts
6	Argyle Ave./Franklin Ave. & US-101 northbound on-ramp	Signalized	2008 traffic counts
7	Argyle Ave. & Hollywood Blvd.	Signalized	2008 traffic counts
8	Argyle Ave. & Selma Ave.	Signalized	Previous 2006 traffic study[c]
9	Argyle Ave. & Sunset Blvd.	Signalized	Previous 2006 traffic study[c]
10	El Centro Ave. & Hollywood Blvd.	Stop-controlled	2007 traffic counts[b]
11	El Centro Ave. & Sunset Blvd.	Signalized	2007 traffic counts[b]
12	Gower St. & Franklin Ave.	Signalized	2007 traffic counts[b]
13	Gower St. & US-101 northbound off-ramp	Stop-controlled	2008 traffic counts
14	US-101 southbound off-ramp/Yucca Street & Gower Street	Stop-controlled	2008 traffic counts
15	Gower St. & Hollywood Blvd.	Signalized	2008 traffic counts
16	Gower St. & Selma Ave.	Stop-controlled	2008 traffic counts
17	Gower St. & Sunset Blvd.	Signalized	2008 traffic counts
18	Gower St. & Fountain Ave.	Signalized	2008 traffic counts
19	Gower St. & Santa Monica Blvd.	Signalized	2007 traffic counts[b]
20	Bronson Ave. & Hollywood Blvd.	Signalized	2007 traffic counts[b]
21	Bronson Ave. & Sunset Blvd.	Signalized	2007 traffic counts[b]
22	Hollywood Blvd. & US-101 southbound on-ramp/off-ramp	Signalized	2007 traffic counts[b]
23	Hollywood Blvd. & US-101 northbound on-ramp/ off-ramp	Signalized	2007 traffic counts[b]
24	US-101 southbound on-ramp at Sunset Blvd.	Uncontrolled	2007 traffic counts[b]
25	El Centro Ave. & De Longpre Ave.	Stop-controlled	2007 traffic counts[b]
26	Gower St. & De Longpre Ave.	Stop-controlled	2007 traffic counts[b]
27	El Centro Ave. & Fountain Ave.	Signalized	2007 traffic counts[b]

[a] *All signalized intersections are currently operating under the ATSAC and ATCS systems.*
[b] *The traffic volumes were increased by 1 percent to reflect 2008 conditions.*
[c] *The traffic volumes were increased 1 percent per year up to 2008 to reflect 2008 conditions.*

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

Columbia Square

matrix environmental

N

No to scale

Figure IV.I-1
Location of Study Intersections and Neighborhood Street Segments

Source: Fehr & Peers/Kaku Associates, 2008

Columbia Square

matrix environmental

N

No to scale

Figure IV.I-2
Existing 2008 A.M. and P.M. Peak Hour Traffic Volumes

Source: Fehr & Peers/Kaku Associates, 2008

In accordance with standard LADOT procedures, a capacity adjustment increase of 7 percent (0.07 V/C ratio adjustment) is applied to reflect the benefits of the ATSAC system at the signalized intersections and a capacity adjustment increase of 3 percent (0.03 V/C ratio adjustment) is applied to reflect the benefits of ATCS system at the signalized intersections. Table IV.I-2 on page IV.I-9 provides the existing V/C ratio or delay and corresponding LOS for each study intersection. As shown in Table IV.I-2, all of the study intersections are currently operating at LOS D or better during the A.M. and P.M. peak hours, except the intersection of Bronson Avenue and Sunset Boulevard. This intersection is operating at LOS E and F in the A.M. and P.M. peak hours, respectively.

(b) Neighborhood Street Segments

To address community members concerns regarding the potential for project impacts on local residential streets adjacent to the project site, four neighborhood street segments were selected for analysis in the Traffic Study. The four neighborhood street segments are shown in Figure IV.I-1 above. Existing 2008 average daily traffic (ADT) volumes for the four neighborhood street segments were established by applying a one percent ambient growth factor to the volumes obtained from 24-hour traffic counts conducted in June 2007. Table IV.I-3 on page IV.I-11 lists each neighborhood street segment and its corresponding 24-hour ADT volumes. As shown in Table IV.I-3, residential street segment no. 4 (El Centro Avenue south of Leland Way) has the greatest ADT volume with 5,677 vehicle trips. Residential street segment no. 2 (Harold Way east of Gower Street) has the lowest ADT volume with 337 vehicle trips.

b. Regulatory Framework

(1) Congestion Management Program

The Congestion Management Program (CMP) was enacted by Proposition 111 in 1990 to address increasing public concern with traffic congestion impacting the quality of life and economic vitality of the State of California. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. Metro, the local CMP agency, has established a countywide approach to implement the statutory requirements of the CMP in their 2004 CMP for Los Angeles County. The countywide approach includes designating a highway network comprising all state highways and principal arterials within the County and monitoring the network's level of service standards.

Table IV.I-2
Existing 2008 Intersection Level of Service

No.	Intersection[a]	Peak Hour	V/C or Delay	LOS
1	Cahuenga Blvd. & Sunset Blvd.	A.M.	0.786	C
		P.M.	0.656	B
2	Vine St./Franklin Ave. & US-101 southbound off-ramp	A.M.	0.321	A
		P.M.	0.400	A
3	Vine St. & Hollywood Blvd.	A.M.	0.777	C
		P.M.	0.880	D
4	Vine St. & Selma Ave.	A.M.	0.398	A
		P.M.	0.592	A
5	Vine St. & Sunset Blvd.	A.M.	0.778	C
		P.M.	0.760	C
6	Argyle Ave./Franklin Ave. & US-101 northbound on-ramp	A.M.	0.755	C
		P.M.	0.848	D
7	Argyle Ave. & Hollywood Blvd.	A.M.	0.419	A
		P.M.	0.461	A
8	Argyle Ave. & Selma Ave.	A.M.	0.224	A
		P.M.	0.294	A
9	Argyle Ave. & Sunset Blvd.	A.M.	0.533	A
		P.M.	0.550	A
10	El Centro Ave. & Hollywood Blvd.[b]	A.M.	0.506	A
		P.M.	0.698	A
11	El Centro Ave. & Sunset Blvd.	A.M.	0.483	A
		P.M.	0.595	A
12	Gower St. & Franklin Ave.	A.M.	0.727	C
		P.M.	0.810	D
13	Gower St. & US-101 northbound off-ramp[b]	A.M.	0.327	A
		P.M.	0.470	A
14	Gower St. & US-101 southbound off-ramp[b]	A.M.	0.633	A
		P.M.	0.552	A
15	Gower St. & Hollywood Blvd.	A.M.	0.665	B
		P.M.	0.543	A
16	Gower St. & Selma Ave.[b]	A.M.	0.741	A
		P.M.	0.558	A
17	Gower St. & Sunset Blvd.	A.M.	0.849	D
		P.M.	0.722	C

Table IV.I-2
Existing 2008 Intersection Level of Service

No.	Intersection[a]	Peak Hour	V/C or Delay	LOS
18	Gower St. & Fountain Ave.	A.M.	0.778	C
		P.M.	0.772	C
19	Gower St. & Santa Monica Blvd.	A.M.	0.764	C
		P.M.	0.827	D
20	Bronson Ave. & Hollywood Blvd.	A.M.	0.622	B
		P.M.	0.696	B
21	Bronson Ave. & Sunset Blvd.	A.M.	0.920	E
		P.M.	1.025	F
22	Hollywood Blvd. & US-101 southbound on-ramp/ off-ramp	A.M.	0.613	B
		P.M.	0.525	A
23	Hollywood Blvd. & US-101 northbound on-ramp/off-ramp	A.M.	0.642	B
		P.M.	0.466	A
24	Sunset Blvd. & US-101 southbound on-ramp[c]	A.M.	0.580	A
		P.M.	0.712	A
25	El Centro Ave. & De Longpre Ave.[b]	A.M.	0.198	A
		P.M.	0.365	A
26	Gower St. & De Longpre Ave.[b]	A.M.	0.688	A
		P.M.	0.598	A
27	El Centro Ave. & Fountain Ave.	A.M.	0.429	A
		P.M.	0.457	A

[a] *In accordance with standard LADOT procedures, the signalized intersections, which are currently operating under the ATSAC and ATCS systems, were given a total credit of 0.1 in V/C ratio (0.07 for ATSAC and 0.03 for ATCS) in this analysis.*

[b] *This intersection is stop-controlled. Analysis was performed assuming the CMA methodology and a reduced capacity of 1,200 vehicles per lane.*

[c] *This intersection is uncontrolled. Analysis was performed assuming the CMA methodology and a reduced capacity of 1,200 vehicles per lane.*

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

Based on Metro's 2004 CMP for Los Angeles County, a Transportation Impact Analysis (TIA) must be conducted at all CMP intersection monitoring locations where a project would add 50 or more trips during the A.M. or P.M. peak hours. A TIA must also be conducted at all CMP freeway monitoring locations where a project would add 150 or more trips in either direction during the A.M. or P.M. peak hours. The following lists CMP intersection and freeway monitoring locations located in the vicinity of the project site.

Table IV.I-3
Existing 2008 Average Daily Traffic Volumes for Neighborhood Street Segments

No.	Neighborhood Street Segment	Average Daily Traffic Volume
1	Selma Ave. east of Gower St.	443
2	Harold Way east of Gower St.	337
3	Labaig Ave. north of Sunset Blvd.	544
4	El Centro Ave. south of Leland Way	5,677

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

CMP Intersection Monitoring Locations

- Santa Monica Boulevard and Western Avenue
- Santa Monica Boulevard and Highland Avenue

CMP Freeway Monitoring Location

- US-101 at Santa Monica Boulevard

(2) Hollywood Community Plan

The Hollywood Community Plan is a component of the Land Use Element of the City of Los Angeles' General Plan. The Hollywood Community Plan serves as a guide to the development, betterment, and change of the Hollywood Community to meet existing and anticipated needs and conditions, as well as to balance growth and stability, reflect economic potentials and limits, land development and other trends, and to protect investment to the extent reasonable and feasible. The most recent version of the Hollywood Community Plan was adopted in December 1988 by the City of Los Angeles, but is currently in the process of being updated. The Circulation section of the Hollywood Community Plan states the following with regard to transportation:

> *"No increase in density shall be effected by zone change or subdivision unless it is determined that the local streets, major and secondary highways, freeways, and public transportation available in the area of the property involved, are adequate to serve the traffic generated. Adequate highway improvements shall be assured prior to the approval of zoning permitting intensification of land uses in order to avoid congestion and assure proper development".*

(3) Los Angeles Municipal Code

Section 12.21.A.4 of the Los Angeles Municipal Code (LAMC) sets forth parking requirements for various land uses. Specifically, Section 12.21.A.4(x)(3) of the LAMC states that two parking spaces per 1,000 square feet of combined gross floor area of office, retail, restaurant, and bar uses shall be provided within the Hollywood Redevelopment Project Area as delineated by Ordinance No. 161,202. Section 12.21.A.4(b) states that for hotel uses (noted as "guest rooms"), one space for each of the first 30 rooms, one space for every two rooms for the next 30 rooms, and one space for every three rooms beyond 60 rooms shall be provided.

(4) City Planning Department's "Residential Parking Policy for Division of Land – No. AA 2000-1"

Parking requirements for condominiums are also set forth in the City Planning Department's "Residential Parking Policy for Division of Land – No. AA 2000-1." This policy document provides an elevated parking requirement for new condominiums and condominium conversions of two spaces per unit plus an additional 0.25 spaces per unit for guest parking in non-parking congested areas or an additional 0.5 spaces per unit for guest parking in parking congested areas. The project site is in a parking congested area.

3. Project Impacts

a. Methodology

(1) Construction

The analysis of construction traffic included a determination of the number of construction-related vehicle trips (i.e., construction worker trips and construction truck trips) that would occur as a result of the project. The impacts of these estimated numbers of trips on the existing roadway system were then qualitatively assessed.

(2) Operation

(a) Intersections

As discussed above, the City of Los Angeles utilizes CMA methodology to evaluate traffic conditions at signalized intersections. The CMA methodology determines the intersection V/C ratio. The stop-controlled and uncontrolled intersections were analyzed using the CMA methodology and a reduced capacity of 1,200 vehicles per hour per lane.

The intersection V/C ratio or delay is then assigned an LOS rating to describe intersection operations (i.e., degree of congestion). As discussed in greater detail below, traffic impacts were evaluated by: (1) analyzing the future 2013 "without project" traffic conditions (existing conditions plus ambient growth and growth from related projects in the area); (2) determining the trip generation for the project based on the types of uses proposed by the project and providing credits for existing uses, pass-by trips, internal capture, and public transportation; (3) assigning these project trips to the roadway network; (4) evaluating the service condition of the roadways with the addition of the project trips; and (5) comparing future 2013 "without project" conditions with the future 2013 "with project" conditions to obtain the change in service levels caused by the project. These changes were compared to the significance thresholds set forth by LADOT to determine whether significant impacts would occur.

(i) Future 2013 Trip Generation Without Project

Build-out of the project is anticipated to be complete in 2013. To simulate future traffic conditions on intersections in 2013 without the project, an ambient growth rate of 1.0 percent per year was added to the existing intersection traffic volumes through the year 2013. The ambient growth rate is based on historical trends and was determined in consultation with LADOT.

In addition to the ambient growth rate, trips associated with related projects anticipated to be constructed in the vicinity of the project site were also applied to future 2013 without project conditions. The list of related projects was created based on information obtained from the City of Los Angeles, previous studies conducted in the vicinity of the project site, and developers in the Hollywood area. In all, a total of 94 related projects were identified. Table III-1 on page III-16 (Section III of this EIR) lists the 94 related projects and Figure III-1 on page III-21 (also in Section III of this EIR) depicts the location of the 94 related projects in relation to the project site. Traffic volumes anticipated to be generated by related projects were estimated based on rates obtained from the Institute of Transportation Engineers' (ITE) *2003 Trip Generation Manual (7th Edition)* as well as previous traffic studies. The traffic volumes were then assigned to the street network based on a variety of trip distribution factors. It should be noted that the estimates are conservative in that, in many cases, they do not account for the existing uses to be removed or the use of alternative travel modes (public transit, walking, etc).

(ii) Project Trip Generation

Traffic volumes generated by the project were estimated based on rates obtained from the *ITE 2003 Trip Generation Manual (7th Edition)* for the various uses proposed. For the purposes of the Traffic Study, the 400 residential units were assumed to be 50 percent ownership units and 50 percent rental units. The percentage of ownership units versus rental units is not determined at this time; however, it is anticipated that the rental units

would constitute no more than 50 percent. In order to ensure a conservative analysis, the percent of rental units were assumed to be on the higher end, as rental units tend to generate more trips than condominiums/townhomes.

Additionally, various forms of credit were applied to the projected number of trips estimated for the project including: (1) trip credits for existing uses on the project site (driveway counts were conducted on Thursday, November 2, 2006 to determine the number of existing peak hour trips that could be credited to the project); (2) trip credits for pass-by trips (per LADOT policy); (3) trip credits for internal capture within the proposed mix-use development; and (4) transit trip credits for people that would travel to the project site via public transportation. Based on direction provided by LADOT, a transit trip credit of 15 percent was applied to the project for its proximity to the Metro Red Line's Hollywood and Vine Station (located approximately one-quarter mile northwest of the project site), as well as the number of transit lines and routes that serve the Hollywood area.

(iii) Project Trip Distribution and Assignment

Project generated traffic was then assigned to the street network based on a trip distribution pattern developed in conjunction with LADOT and consistent with the Southern California Area of Governments (SCAG) regional model, as well as previous Hollywood area traffic studies. The distribution pattern allocated 25 percent of traffic to/from the north (including 20 percent on US-101), 15 percent of traffic to/from the south, 15 percent of traffic to/from the east, 15 percent of traffic to/from the west, and 30 percent of traffic to/from the southeast (on US-101).

(iv) Future 2013 Trip Generation with Project

The proposed project traffic volumes were added to the future 2013 (ambient growth plus related projects) without project traffic volumes to determine future 2013 with project traffic volumes.

(v) Identification of Project Impacts

Once the V/C ratios or delay and corresponding LOS were identified for each intersection under the "without project" and "with project" conditions, a comparison of the impacts at each intersection was made. The resulting change was then compared with the significance thresholds identified by LADOT to determine whether significant impacts would result.

(b) Neighborhood Street Segments

As previously discussed, build-out of the project is anticipated to be complete in 2013. Similar to the methodology described above for intersections, to simulate future

traffic conditions on neighborhood street segments in 2013 without the project, an ambient growth rate of 1.0 percent per year was added to the existing ADT volumes through the year 2013 as well as traffic generated from the 94 related projects. ADT volumes anticipated to be generated by the project on neighborhood street segments were based on the project trip generation and distribution pattern described previously. However, based upon a 95th percentile queue and the location of Labaig Avenue in relation to Gower Street, approximately 20 percent of the westbound traffic at Sunset Boulevard and Gower Street may queue beyond the intersection of Sunset Boulevard and Labaig Avenue in the P.M. peak hour at build-out. Therefore, it was assumed that 20 percent of the projected right-turning vehicles utilizing the westbound right approach would detour northbound on Labaig Avenue and westbound on Selma Avenue to the project site. Because there is no signal at Sunset Boulevard and Labaig Avenue, making the left turn from Labaig Avenue to Sunset Boulevard would be difficult during peak hours, so only 5 percent of the traffic heading outbound to Sunset Boulevard to the east was assumed to use Selma Avenue and Labaig Avenue to get to Sunset Boulevard. Additionally, only 5 percent of the traffic was assumed to use Harold Way to travel to and from the project site from Sunset Boulevard.

Future 2013 without project ADT volumes were added to the project ADT volumes to determine future 2013 with project ADT volumes on each neighborhood street segment. The future 2013 without project ADT levels were then compared to the future 2013 with project ADT levels. The difference was compared to significance thresholds identified by LADOT to determine whether significant impacts would result.

(c) Project Access

To evaluate the ability of the project's proposed access plan to accommodate the anticipated traffic levels (future 2013 with project scenario), each proposed driveway was analyzed for LOS and queue using the Transportation Research Board's 2000 Highway Capacity Manual (HCM) methodology. The HCM methodology measures stop-controlled intersection's operations by the average total delay in seconds per vehicle. The proposed driveways on Selma Avenue and El Centro Avenue were analyzed as full movement driveways. The proposed driveway on Gower Street was analyzed with right turns only.

(d) Congestion Management Program

(i) Intersections and Freeways

For the CMP intersection and freeway monitoring locations meeting the threshold criteria outlined in Metro's 2004 CMP for Los Angeles County, a TIA was prepared to determine the potential impacts of the project on these CMP monitoring locations. For freeway monitoring locations, existing peak hour traffic volumes were established via information published in the State of California Department of Transportation's (Caltrans)

2005 Traffic Volumes on California State Highways. The 2005 mainline freeway traffic volumes were increased to reflect 2008 volumes (the baseline year used for the project). Similar to intersections, LOS is used to describe the existing traffic conditions for freeway segments. However, the calculation of LOS for freeway segments is based on demand-to-capacity (D/C) ratios. Additionally, for freeway segments, LOS F is further divided into LOS F(0) through F(3) where F(0) through F(3) represent severe congestion (travel speeds less than 25 mph for more than one hour). Similar to the methodology described above for intersections, to simulate future traffic conditions on freeway segments in 2013 without the project, an ambient growth rate was added to the existing traffic volumes through the year 2013 as well as traffic generated from the 94 related projects. Traffic volumes anticipated to be generated by the project on freeway segments were based on the project trip generation and distribution pattern described previously. Future 2013 without project traffic volumes were added to the project traffic volumes to determine future 2013 with project traffic volumes on each freeway segment. The future 2013 without project traffic levels were then compared to the future 2013 with project traffic levels. The difference was compared to significance thresholds identified by Metro's 2004 CMP to determine whether significant impacts would result.

(ii) Public Transit Service

The analysis of the project's potential impacts on public transit service is based on the methodology provided in Appendix B-4 of Metro's 2004 CMP. The methodology estimates the number of person trips by utilizing an average vehicle rider factor of 1.4 applied to the project-generated trips (calculated without the LADOT 15 percent transit credit). The methodology then uses the 15 percent transit credit applied to the project per LADOT to determine the total person trips as transit riders.

(e) Parking

To analyze whether sufficient parking spaces would be provided by the project, the number of spaces required by the LAMC and Residential Parking Policy on Division of Land No. AA 2000-1 (Residential Parking Policy) for the proposed uses was compared to the number of spaces to be provided by the project. In order to maintain a conservative analysis, all 400 residential units were assumed to be condominiums as the parking requirements for condominiums are higher than those of apartments. The LAMC and Residential Parking Policy parking requirements were compared to the project's proposed parking supply.

(f) Consistency with Regulatory Framework

The methodology for this analysis includes a review of relevant transportation regulations, plans, and policies and a determination of whether the project would conflict with these regulations, plans, and policies.

b. Significance Thresholds

(1) Construction

The *City of L.A. CEQA Thresholds Guide (2006)* does not specify a threshold of significance for a project's construction-related traffic impact, stating that the determination of significance shall be made on a case-by-case basis, considering the temporary traffic impacts, temporary loss of access, temporary loss of bus stops or rerouting of bus lines, and temporary loss of on-street parking. Based on these considerations, for the purposes of this analysis, project construction would have a significant impact on traffic and circulation if construction activities were to: (1) cause substantial delays and disruption of existing traffic flow; (2) require temporary relocation of existing bus stops to more than one-quarter mile from their existing stops; or (3) would result in the substantial loss of on-street parking such that the parking needs of the project area would not be met.

(2) Operation

(a) Intersections

According to the intersection impact threshold criteria set forth in LADOT's 2002 Traffic Study Policies and Procedures as well as the *City of L.A. CEQA Thresholds Guide (2006)*, a significant impact on intersection capacity would occur based on the sliding scale criteria presented in Table IV.I-4 on page IV.I-18. As shown in Table IV.I-4, an intersection would be significantly impacted if the following circumstances would occur: (1) an increase in V/C ratio equal to or greater than 0.04 for intersections operating at LOS C after the addition of project traffic; (2) an increase in V/C ratio equal to or greater than 0.02 for intersections operating at LOS D after the addition of project traffic; or (3) an increase in V/C ratio equal to or greater than 0.01 for intersections operating at LOS E or F after the addition of project traffic. Intersections operating at LOS A or B after the addition of the project traffic are not considered significantly impacted regardless of the increase in V/C ratio.

(b) Neighborhood Street Segments

According to the neighborhood street segment impact threshold criteria set forth in LADOT's 2002 Traffic Study Policies and Procedures as well as the *City of L.A. CEQA Thresholds Guide (2006),* a significant impact on neighborhood street segment capacity would occur based on the sliding scale criteria presented in Table IV.I-5 on page IV.I-18. As shown in Table IV.I-5, a neighborhood street segment would be significantly impacted if the project-related increase in ADT would exceed the ADT percentages specified for the final ADT volumes.

Table IV.I-4
Intersection Impact Threshold Criteria

Final V/C With Project	Level of Service	Project Related Increase in V/C
0.701 - 0.800	C	≥ 0.040
0.801 - 0.900	D	≥ 0.020
≥ 0.901	E or F	≥ 0.010

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

Table IV.I-5
Neighborhood Street Segment Impact Threshold Criteria

Final ADT Volumes With Project	Project Related Increase in ADT Volumes
0 - 999	16 percent or more of final ADT
≥ 1,000	12 percent or more of final ADT
≥ 2,000	10 percent or more of final ADT
≥ 3,000	8 percent or more of final ADT

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

(c) Project Access

According to the *City of L.A. CEQA Thresholds Guide (2006),* a project would have a significant impact on project access if the intersections nearest the primary site access are projected to operate at LOS E or F during the A.M. or P.M. peak hours under future with project conditions. However, neither LADOT nor the *City of L.A. CEQA Thresholds Guide (2006)* has established a significance threshold regarding a project's potential impact on driveway access and on-street queuing at project driveways. Thus, impacts to access and queuing associated with the project were considered to be significant if the primary site driveway(s) are projected to operate at an unacceptable LOS E or F during one or both of the a.m. and p.m. peak hours.

(d) Congestion Management Program

(i) Intersections and Freeways

According to the intersection and freeway impact threshold criteria set forth in Metro's 2004 CMP for Los Angeles County, a significant impact on intersection and freeway monitoring locations would occur if the project would increase the V/C ratio for intersections or the D/C ratio for freeways by two percent or more (V/C or D/C greater than or equal to 0.02), causing LOS F (V/C or D/C greater than 1.00). If the facility is already

operating at LOS F, a significant impact would occur if the project would increase the V/C or D/C ratio by two percent or more (V/C or D/C greater than or equal to 0.02).

(ii) Public Transit Service

According to Metro's 2004 CMP for Los Angeles County and the *City of L.A. CEQA Thresholds Guide (2006),* a significant impact to public transit service would occur if the project would substantially increase the number of transit passengers when compared to available transit capacity.

(e) Parking

The screening criteria for parking impacts as set forth in the *City of L.A. CEQA Thresholds Guide (2006)* state that if the project's proposed parking supply would be less than that required by City code, including the Los Angeles Municipal Code (LAMC), Transportation Specific Plan, or Interim Control Ordinance requirements, further analysis is required to determine parking impacts. If the parking supply would meet City code requirements, there would normally be no significant parking impacts from the project. According to the *City of L.A. CEQA Thresholds Guide (2006),* a project would normally have a significant impact on parking if the project provides less parking than needed as determined through an analysis of parking demand for the project.

(f) Consistency with Regulatory Framework

The *City of L.A. CEQA Thresholds Guide (2006)* does not specify a threshold of significance for a project's consistency with relevant transportation regulations, plans, and policies. Therefore, for purposes of this analysis, significant impacts related to consistency with relevant transportation regulations, plans, and policies would result if the project would conflict with such regulations, plans, and policies.

c. Project Design Features

(1) Construction

Construction of the project is estimated to occur over a 48-month period beginning in 2009 and ending in 2013. Construction would occur in four phases including: 1) demolition, 2) site preparation and excavation, 3) building construction, and 4) building finishes. Project construction activities would commence with the demolition of approximately 30,723 square feet of existing structures. This phase is expected to occur over approximately four to six months. The grading and excavation activities would occur over approximately four to six months. Construction of the proposed buildings would occur over

a two-year period, with building finishes occurring over 12 months. In accordance with the LAMC, construction activities would be limited to 7:00 A.M. to 9:00 P.M., Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturdays and holidays. No construction activities would occur on Sundays. Most, if not all, truck trips would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) to minimize generating truck trips during the P.M. peak hours.

(2) Operation

(a) Parking and Site Access

The project would include a nine-level parking facility with approximately 2,004 parking spaces located within the central portion of the site. The three lower levels of the parking facility would be subterranean, while the upper levels would begin from ground level and form the podium upon which the residential tower and townhomes would be located. Segregated residential parking would be provided on the three subterranean levels, while office, retail, and hotel parking would be provided on the remaining upper levels. The parking facility would be physically integrated with surrounding development within the interior of the site such that it would be surrounded by the residential tower to the west, the townhomes to the north, the office and townhomes to the east, and the existing buildings to the south and therefore, would generally not be visible from surrounding areas.

(b) Vehicle and Pedestrian Access

Vehicular access to the parking structure would be provided via driveways on El Centro Avenue, Selma Avenue, and Gower Street. The vehicular access driveways along Gower Street would not align with Harold Way, which provides access to neighborhood residential uses adjacent to the project site. A porte cochere with valet service for hotel guests would be provided off of El Centro Avenue with an entrance driveway from El Centro Avenue at the south end of the porte cochere and an exit driveway to El Centro Avenue at the north end of the porte cochere. Hotel valets would take cars down to the subterranean level of the parking facility via a ramp at the north end of the porte cochere and would return cars from the parking facility via a ramp at the south end of the porte cochere. Segregated residential parking would be provided on the lower three subterranean levels accessed from El Centro Avenue via the ramp at the south end of the porte cochere (for residential entry) and the ramp at the north end of the porte cochere (for residential exit). A residential drop-off zone would be provided within the ground level of the parking facility near the Selma Avenue driveway. The Gower Street driveway would be right-in/right-out only and would provide access to the second aboveground level of the parking facility via a ramp for office employees. Valet service for office visitors and retail

patrons would be provided on the ground level. The right-in/right-out only on Gower Street would help to reduce the number of vehicles intruding on neighborhood streets.

Additionally, the new rehabilitated Sunset Courtyard would be provided midpoint along Sunset Boulevard allowing pedestrians to access to the project site.

(c) Loading and Trash Pick-up Operations

A loading area serving the commercial uses would be provided on the ground level of the parking facility. Trucks would enter via the Selma Avenue driveway head first, back into the loading areas for the office and retail spaces, and then exit via the Gower Street driveway head first. A loading and trash pick-up area serving the residential uses would be provided on the northwest corner of the project site along Selma Avenue (the same driveway described above to access the parking structure). Trucks would enter the project site head first, back into the loading or trash pick-up area for the residential uses, and then exit back to Selma Avenue head first. The design of both these areas minimizes potential traffic impacts on Gower Street and Selma Avenue as trucks would turn around within the project site and would not back into or out of the project site on public streets.

(d) Alternative Transportation Strategies

To encourage the use of alternative modes of transportation, the project would also implement the following project design features:

- Preparation and implementation of a Transportation Demand Management (TDM) Plan that would promote the use of alternative transportation, such as mass-transit, ride-sharing, bicycling, and walking to reduce project trips and and/or vehicle miles traveled;
- Provision of on-site bicycle storage for residents and employees; and
- Allocation of preferred parking for low-emitting/fuel-efficient and carpool vehicles.

d. Analysis of Project Impacts

(1) Construction

Construction of the project would generate traffic from construction worker trips and construction truck trips (i.e., the arrival and departure of trucks for the removal of debris generated by on-site demolition and excavation activities). The number of construction workers would vary throughout construction activities with Phase 3 (building construction) generating the highest number of construction worker trips. The majority of the

construction workers are anticipated to arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.), thereby avoiding generating trips during the A.M. and P.M. peak traffic periods. Demolition of the project site would involve the removal of approximately 2,381 tons of demolition debris. An average of 5 truck trips (arrivals and departures) per day would be required during the six-month demolition period. Excavation of the project site would involve the removal of approximately 190,000 cubic yards of earth. An average of 120 truck trips (arrivals and departures) per day is expected during the six-month excavation period. Another source of construction traffic would be associated with the transportation of materials and equipment to the site. An average of 5 delivery/vendor truck trips per day is expected. As discussed previously, most, if not all, of these truck trips would be scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) to avoid generating trips during the P.M. peak period. The haul route for trucks leaving the project site would most likely be via El Centro Avenue or Gower Street south, to Sunset Boulevard east, to US-101. Although the ultimate demolition and excavation haul sites are not known at this time, trucks returning to the project site are expected to take the same route back. The number of construction workers would vary throughout the construction period with the building construction phase generating the maximum number of trips. It is estimated that a maximum of 400 to 450 employee-related trips on a daily basis, including 200 to 225 arrivals and 200 to 225 departures. Construction workers are not all likely to arrive at the construction site within the same hour nor would they leave the site at the same time. Thus, the number of worker trips is expected to be substantially less than the peak hour trip generation associated with the project once it is in operation (approximately 9,226 total external daily trips including 758 trips during the a.m. peak hour and 755 trips during the p.m. peak hour as later discussed). Therefore, construction traffic-related impacts associated with the worker trips would be far less than those identified for project operation.

However, given the level of traffic at some of the study intersections near the project site, the combination of construction worker trips and construction truck trips could cause temporary adverse impacts at some intersections during construction activities. However, the City of Los Angeles would require the project to prepare and implement a Construction Staging and Traffic Management Plan in compliance with LAMC requirements. The Construction Staging and Traffic Management Plan would identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of demolition and construction activities associated with the project. Therefore, compliance with the Construction Staging and Traffic Management Plan as outlined in Mitigation Measure I-1 below, would reduce construction-related impacts to a less than significant level.

Construction activities such as lane closures, sidewalk closures, and utility line construction, could have implications in relation to response time for emergency vehicles

due to travel time delays. However, as discussed previously, the City of Los Angeles would require the project to prepare and implement a Construction Staging and Traffic Management Plan as outlined in Mitigation Measure I-1. Therefore, potential impacts to emergency access during construction would be less than significant.

During the first phase of construction (demolition), it is anticipated that construction employees would park on-site on a portion of the existing parking area on the northern half of the project site. During the excavation phase and the first portion of the building construction while the subterranean parking garage is under construction, it is anticipated that construction employees would be parked off-site and shuttled to the project site. Potential off-site parking locations would be identified in the Construction Staging and Traffic Management Plan. Once the subterranean parking structure component of the project is complete, construction workers would be parked on-site in the garage. In the absence of measures to control the construction worker parking, the need to park workers off-site during a portion of the construction period could result in impacts because it could lead to worker parking spilling over into adjacent areas, such as residential areas east of Gower Street or south of Sunset Boulevard. With implementation of the Construction Staging and Traffic Management Plan as outlined in Mitigation Measure I-1, construction parking impacts would be less than significant.

(2) Operation

(a) Intersections

(i) Future 2013 Without Project

Figure IV.I-3 on page IV.I-24 depicts the future 2013 without project A.M. and P.M. peak hour traffic volumes at all 27 study intersections. In addition, Table IV.I-6 on page IV.I-25 provides the future 2013 without project A.M. and P.M. peak hour V/C ratios and corresponding LOS for each study intersection. As shown in Table IV.I-6, 18 study intersections would operate at LOS D or better during the A.M. and P.M. peak hours, while the following nine study intersections would operate at LOS E or F during the A.M. and/or P.M. peak hours:

- Vine Street & Hollywood Boulevard (A.M. and P.M.)
- Vine Street & Sunset Boulevard (P.M. only)
- Argyle Avenue/Franklin Avenue & US-101 northbound on-ramp (P.M. only)
- El Centro Avenue & Hollywood Boulevard (P.M. only)
- Gower Street & Franklin Avenue (P.M. only)

Columbia Square

Figure IV.I-3
Future 2013 Without Project
A.M. and P.M. Peak Hour Traffic Volumes

No to scale

Source: Fehr & Peers/Kaku Associates, 2008

Table IV.I-6
Future 2013 Intersection Level of Service Without and With Project

No.	Intersection [a]	Peak Hour	Future 2013 Without Project V/C or Delay	LOS	Future 2013 With Project V/C or Delay	LOS	V/C or Delay Increase	Significant Impact?
1	Cahuenga Blvd. & Sunset Blvd.	A.M.	0.889	D	0.895	D	0.006	No
		P.M.	0.852	D	0.860	D	0.008	No
2	Vine St./Franklin Ave. & US-101 southbound off-ramp	A.M.	0.381	A	0.381	A	0.000	No
		P.M.	0.445	A	0.445	A	0.000	No
3	Vine St. & Hollywood Blvd.	A.M.	0.917	E	0.921	E	0.004	No
		P.M.	1.187	F	1.192	F	0.005	No
4	Vine St. & Selma Ave.	A.M.	0.452	A	0.501	A	0.049	No
		P.M.	0.678	B	0.713	C	0.035	No
5	Vine St. & Sunset Blvd.	A.M.	0.868	D	0.880	D	0.012	No
		P.M.	0.901	E	0.914	E	0.013	**Yes**
6	Argyle Ave./Franklin Ave. & US-101 northbound on-ramp	A.M.	0.849	D	0.866	D	0.017	**No**
		P.M.	0.976	E	1.000	E	0.024	**Yes**
7	Argyle Ave. & Hollywood Blvd.	A.M.	0.625	B	0.629	B	0.004	No
		P.M.	0.759	C	0.811	D	0.052	**Yes**
8	Argyle Ave. & Selma Ave.	A.M.	0.296	A	0.349	A	0.053	No
		P.M.	0.437	A	0.525	A	0.088	No
9	Argyle Ave. & Sunset Blvd.	A.M.	0.654	B	0.658	B	0.004	No
		P.M.	0.721	C	0.728	C	0.007	No
10	El Centro Ave. & Hollywood Blvd.[b]	A.M.	0.719	C	0.748	C	0.029	No
		P.M.	0.986	E	1.015	F	0.029	**Yes**
11	El Centro Ave. & Sunset Blvd.	A.M.	0.625	B	0.689	B	0.064	No
		P.M.	0.763	C	0.817	D	0.054	**Yes**
12	Gower St. & Franklin Ave.	A.M.	0.802	D	0.856	D	0.054	**Yes**
		P.M.	0.915	E	0.957	E	0.042	**Yes**
13	Gower St. & US-101 northbound off-ramp[b]	A.M.	0.366	A	0.403	A	0.037	No
		P.M.	0.498	A	0.504	A	0.006	No
14	Gower St. & US-101 southbound off-ramp[b]	A.M.	0.703	C	0.743	C	0.040	**Yes**
		P.M.	0.601	B	0.622	B	0.021	No
15	Gower St. & Hollywood Blvd.	A.M.	0.837	D	0.900	D	0.063	**Yes**
		P.M.	0.733	C	0.778	C	0.045	**Yes**
16	Gower St. & Selma Ave.[b]	A.M.	0.857	D	1.098	F	0.241	**Yes**
		P.M.	0.658	B	0.845	D	0.187	**Yes**
17	Gower St. & Sunset Blvd.	A.M.	0.976	E	1.021	F	0.045	**Yes**
		P.M.	0.871	D	0.960	E	0.089	**Yes**

Table IV.I-6 (Continued)
Future 2013 Intersection Level of Service Without and With Project

No.	Intersection [a]	Peak Hour	Future 2013 Without Project V/C or Delay	LOS	Future 2013 With Project V/C or Delay	LOS	V/C or Delay Increase	Significant Impact?
18	Gower St. & Fountain Ave.	A.M.	0.844	D	0.851	D	0.007	No
		P.M.	0.857	D	0.864	D	0.007	No
19	Gower St. & Santa Monica Blvd.	A.M.	0.901	E	0.908	E	0.007	No
		P.M.	1.028	F	1.035	F	0.007	No
20	Bronson Ave. & Hollywood Blvd.	A.M.	0.759	C	0.789	C	0.030	No
		P.M.	0.904	E	0.931	E	0.027	**Yes**
21	Bronson Ave. & Sunset Blvd.	A.M.	1.033	F	1.070	F	0.037	**Yes**
		P.M.	1.187	F	1.221	F	0.034	**Yes**
22	Hollywood Blvd. & US-101 southbound on-ramp/off-ramp	A.M.	0.744	C	0.774	C	0.030	No
		P.M.	0.659	B	0.673	B	0.014	No
23	Hollywood Blvd. & US-101 northbound on-ramp/off-ramp	A.M.	0.753	C	0.776	C	0.023	No
		P.M.	0.633	B	0.653	B	0.020	No
24	Sunset Blvd. & US-101 southbound on-ramp[c]	A.M.	0.688	B	0.719	C	0.041	No
		P.M.	0.852	D	0.878	D	0.026	**Yes**
25	El Centro Ave. & De Longpre Ave.[b]	A.M.	0.243	A	0.258	A	0.015	No
		P.M.	0.418	A	0.438	A	0.020	No
26	Gower St. & De Longpre Ave.[b]	A.M.	0.744	C	0.754	C	0.010	No
		P.M.	0.670	B	0.679	B	0.009	No
27	El Centro Ave. & Fountain Ave.	A.M.	0.492	A	0.521	A	0.029	No
		P.M.	0.522	A	0.557	A	0.035	No

[a] *In accordance with standard LADOT procedures, the signalized intersections, which are currently operating under the ATSAC and ATCS systems, were given a total credit of 0.1 in V/C ratio (0.07 for ATSAC and 0.03 for ATCS) in this analysis.*

[b] *This intersection is stop-controlled. Analysis was performed assuming the CMA methodology and a reduced capacity of 1,200 vehicles per lane.*

[c] *This intersection is uncontrolled. Analysis was performed assuming the CMA methodology and a reduced capacity of 1,200 vehicles per lane.*

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

- Gower Street & Sunset Boulevard (A.M. only)
- Gower Street & Santa Monica Boulevard (A.M. and P.M.)
- Bronson Avenue & Hollywood Boulevard (P.M. only)
- Bronson Avenue & Sunset Boulevard (A.M. and P.M.)

(ii) Future 2013 with Project

The number of trips anticipated to be generated by the project is presented in Table IV.I-7 on page IV.I-28. As shown in Table IV.I-7, the project is forecast to generate a net increase of 9,226 trips, including 758 trips during the A.M. peak hour (492 inbound and 266 outbound) and 755 trips during the P.M. peak hour (318 inbound and 437 outbound).

These traffic volumes were added to the future 2013 without project traffic volumes. Figure IV.I-4 on page IV.I-31 depicts the future 2013 with project A.M. and P.M. peak hour traffic volumes at all 27 study intersections. Table IV.I-6 on page IV.I-25 provides the future 2013 with project A.M. and P.M. peak hour V/C ratios and corresponding LOS for each study intersection. As shown in Table IV.I-6, 17 study intersections would operate at LOS D or better during the A.M. and P.M. peak hours, while 10 study intersections would operate at LOS E or F during the A.M. and/or P.M. peak hours. As shown in Table IV.I-6, using the City of Los Angeles' significance thresholds criteria, the project would create significant impacts at the 13 study intersections listed below during the A.M. and/or P.M. peak hours. Mitigation measures to reduce potential impacts to five of these 13 study intersections are discussed below under Subsection 5, Mitigation Measures.

- Vine Street & Sunset Boulevard (P.M. only)
- Argyle Avenue/Franklin Avenue & US-101 northbound on-ramp (P.M. only)
- Argyle Avenue & Hollywood Boulevard (P.M. only)
- El Centro Avenue & Hollywood Boulevard (P.M. only)
- El Centro Avenue & Sunset Boulevard (P.M. only)
- Gower Street & Franklin Avenue (A.M. and P.M.)
- Gower Street & Southbound US-101 off-ramp (A.M. only)
- Gower Street & Hollywood Boulevard (A.M. and P.M.)
- Gower Street & Selma Avenue (A.M. and P.M.)
- Gower Street & Sunset Boulevard (A.M. and P.M.)
- Bronson Avenue & Hollywood Boulevard (P.M. only)
- Bronson Avenue & Sunset Boulevard (A.M. and P.M.)
- US-101 southbound on-ramp & Sunset Boulevard (P.M. only)

Table IV.I-7
Project Trip Generation

		Trip Generation Rates[a]							Estimated Trip Generation						
			A.M. Peak Hour			P.M. Peak Hour				A.M. Peak Hour			P.M. Peak Hour		
Land Use	Amount	Daily Rate	Rate	In	Out	Rate	In	Out	Daily	In	Out	Total	In	Out	Total
Condominium[b]															
Residential	200 du	5.86	0.44	17%	83%	0.52	67%	33%	1,172	15	73	88	70	34	104
Condominium/Townhouse	-5%								(59)	(1)	(3)	(4)	(3)	(2)	(5)
Internal trips credit									1,113	14	70	84	67	32	99
Subtotal	-15%[d]								(167)	(2)	(11)	(13)	(10)	(5)	(15)
Transit use credit									**946**	**12**	**59**	**71**	**57**	**27**	**84**
Net External Vehicle Trips															
Apartment[b]															
Apartments	200 du	6.72	0.51	20%	80%	0.62	65%	35%	1,344	20	82	102	81	43	124
Internal trips credit	-5%								(67)	(1)	(4)	(5)	(4)	(2)	(6)
Subtotal									1,277	19	78	97	77	41	118
Transit use credit	-15%[d]								(192)	(3)	(12)	(15)	(12)	(6)	(18)
Net External Vehicle Trips									**1,085**	**16**	**66**	**82**	**65**	**35**	**100**
Office															
Office	380 ksf	[g]	[g]	88%	12%	[g]	17%	83%	3,729	480	66	546	86	418	504
Internal trips credit	-5%								(186)	(24)	(3)	(27)	(4)	(21)	(25)
Subtotal									3,543	456	63	519	82	397	479
Transit use credit	-15%[d]								(531)	(69)	(9)	(78)	(12)	(60)	(72)
Net External Vehicle Trips									**3,012**	**387**	**54**	**441**	**70**	**337**	**407**
Hotel[h]															
Hotel	125 rm	8.17	0.56	61%	39%	0.59	53%	47%	1,021	43	27	70	39	35	74
Internal trips credit	0%								0	0	0	0	0	0	0
Subtotal									1,021	43	27	70	39	35	74
Transit use credit	-15%[d]								(153)	(7)	(4)	(11)	(6)	(5)	(11)
Net External Vehicle Trips									**868**	**36**	**23**	**59**	**33**	**30**	**63**

Table IV.I-7 (Continued)
Project Trip Generation

		Trip Generation Rates[a]							Estimated Trip Generation						
			A.M. Peak Hour			P.M. Peak Hour				A.M. Peak Hour			P.M. Peak Hour		
Land Use	Amount	Daily Rate	Rate	In	Out	Rate	In	Out	Daily	In	Out	Total	In	Out	Total
Restaurant & Bar I															
Quality Restaurant	20.0 ksf	89.95	0.81	82%	18%	6.10	67%	33%	1,799	13	3	16	82	40	122
Internal trips credit	-20%								(360)	(2)	(1)	(3)	(16)	(8)	(24)
Subtotal									1,439	11	2	13	66	32	98
Transit use credit	-15%[d]								(216)	(2)	0	(2)	(10)	(5)	(15)
Driveway trips									1,223	9	2	11	56	27	83
Pass-by credit	-10%[e]								(122)	(1)	0	(1)	(5)	(3)	(8)
Net External Vehicle Trips									**1,101**	**8**	**2**	**10**	**51**	**24**	**75**
Quick Service Restaurant															
Fast Food w/o Drive thru	11.0 ksf	716.00	43.87	60%	40%	26.15	51%	49%	7,876	290	193	483	147	141	288
Internal trips credit	-50%								(3,938)	(145)	(97)	(242)	(73)	(71)	(144)
Subtotal									3,938	145	96	241	74	70	144
Transit use credit	-15%[d]								(591)	(22)	(14)	(36)	(11)	(11)	(22)
Driveway trips									3,347	123	82	205	63	59	122
Pass-by credit	-10%[e]								(335)	(13)	(8)	(21)	(6)	(6)	(12)
Net External Vehicle Trips									**3,012**	**110**	**74**	**184**	**57**	**53**	**110**
Retail															
Specialty Retail[c]	10.3 ksf	40.00	1.20	60%	40%	3.60	50%	50%	412	7	5	12	19	18	37
Internal trips credit	-40%								(165)	(3)	(2)	(5)	(8)	(7)	(15)
Subtotal									247	4	3	7	11	11	22
Transit use credit	-15%[d]								(37)	(1)	(1)	(1)	(2)	(1)	(3)
Driveway trips									210	3	3	6	9	10	19
Pass-by credit	-10%[e]								(21)	(1)	(1)	(1)	(1)	(1)	(2)
Net External Vehicle Trips									**189**	**2**	**5**	**5**	**8**	**9**	**17**

Table IV.I-7 (Continued)
Project Trip Generation

Land Use	Amount	Trip Generation Rates[a]							Estimated Trip Generation						
		Daily	A.M. Peak Hour			P.M. Peak Hour				A.M. Peak Hour			P.M. Peak Hour		
		Rate	Rate	In	Out	Rate	In	Out	Daily	In	Out	Total	In	Out	Total
								Driveway Trips	10,691	586	289	875	353	525	878
								Total Net External Vehicle Trips From Proposed Land Uses	10,213	571	281	852	341	515	856
								Total Existing Vehicle Trips[i]	(987)	(79)	(15)	(94)	(23)	(78)	(101)
								Final Net External Vehicle Trips	9,226	492	266	758	318	437	755

[a] *Trip generation rates obtained from the ITE 2003 Trip Generation Manual (7th Edition) unless otherwise noted.*
[b] *Residential units could be developed as condominiums or a combination of condominiums and apartments. However, no more than 50 percent of the units (i.e., 200 units) would consist of apartments. Therefore, for purposes of the Traffic Study, the 400 residential units were assumed to be 50 percent ownership units (condominiums/townhouses) and 50 percent rental units (apartments).*
[c] *Trip generation rates for specialty retail obtained from the San Diego Association of Governments April 2002 Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, due to inadequate sample sizes in ITE 2003 Trip Generation Manual (7th Edition).*
[d] *The 15 percent transit credit is per discussion with LADOT in September 2008.*
[e] *Pass-by credit obtained from LADOT's March 2002 Traffic Study Policies and Procedures.*
[f] *Daily and A.M. peak hour rates not available from ITE 2003 Trip Generation Manual (7th Edition) for drinking place. Therefore, daily trips per ksf assumed to be similar to quality restaurant and A.M. peak hour trips assumed to be negligible.*
[g] *ITE office trip generation equations used rather than linear trip generation rate:*
*Daily Ln(T) = 0.77 * Ln(A) + 3.65, where T = trips, A = area in ksf*
*A.M. Peak Hour: Ln(T) = 0.80 * Ln(A) + 1.55, where T = trips, A = area in ksf*
*P.M. Peak Hour: T = 1.21 * A + 78.81, where T = trips, A = area in ksf*
[h] *Hotel trip generation estimates include hotel restaurant and bar trip generation.*
[i] *Traffic counts of existing uses (offices and studios) conducted on November 2, 2006.*

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

Columbia Square

matrix environmental

No to scale

Figure IV.I-4
Future 2013 With Project
A.M. and P.M. Peak Hour Traffic Volumes

Source: Fehr & Peers/Kaku Associates, 2008

(b) Neighborhood Street Segments

The forecast ADT volumes at the neighborhood street segments under future 2013 without project and future 2013 with project scenarios are presented in Table IV.I-8 on page IV.I-33. As shown in Table IV.I-8, trips generated by the project would incrementally increase ADT volumes on each of the four neighborhood street segments by approximately 14.5 to 21.6 percent. As shown in Table IV.I-8, using the City's significance thresholds criteria, the project would create a significant impact at three of the four neighborhood street segments: Harold Way east of Gower Street; La Baig Avenue north of Sunset Boulevard, and El Centro Avenue south of Leland Way.

Mitigation measures to reduce potential impacts to these three neighborhood street segments are discussed below under Subsection 5, Mitigation Measures.

(c) Project Access

The *City of L.A. CEQA Thresholds Guide (2006)* indicates that a project would have a significant impact on project access if the intersections nearest the primary site access are projected to operate at LOS E or F during the A.M. or P.M. peak hours under future with project conditions. The intersection of Gower Street and Selma Avenue on the northeast corner of the project site is expected to operate at LOS F during the A.M. peak hour and the intersection of Gower Street and Sunset Boulevard on the southeast corner of the project site is expected to operate at LOS F and E during the A.M. and P.M. peak hours, respectively. However, based on the site layout and usage patterns, it has been determined that the project's proposed access driveways would not cause an adverse effect on either the project site or adjoining streets. Neither LADOT nor the *City of L.A. CEQA Thresholds Guide (2006)* has established a significance threshold regarding a project's potential impact on driveway access and on-street queuing at project driveways. Thus, impacts to access and queuing associated with the project were considered to be significant if the project resulted in on-street queuing that regularly interfered with traffic flow more than current conditions.

As previously discussed, vehicular access to the project site would be provided via stop-controlled driveways on Gower Street, Selma Avenue, and El Centro Avenue. The project driveways on Selma Avenue and El Centro Avenue would be full movement driveways, and the proposed driveway on Gower Street would be right turn only. Table IV.I-9 on page IV.I-34 shows the resulting delay and corresponding LOS for the three project driveways under future 2013 with project conditions. As Table IV.I-9 indicates, all three project driveways are projected to operate at an overall LOS A during the A.M. and P.M. peak hours. In all cases, the worst delay would occur as vehicles exiting the site wait to access the main roadway. As shown in the table, the highest level of delay would be at the Gower

Table IV.I-8
Future 2013 Neighborhood Street Segment Level of Service Without and With Project

No.	Neighborhood Street Segment	Existing 2008 ADT	Future 2013 ADT Without Project[a]	Project Trips	Future 2013 ADT With Project	Project %	Applicable Impact Criteria[b]	Significant Impact?
1	Selma Avenue east of Gower Street	443	470	79	547	14.5%	16%	**No**
2	Harold Way east of Gower Street	337	357	79	437	18.2%	16%	**Yes**
3	Labaig Ave. between Selma Avenue and Sunset Boulevard	544	577	159	735	21.6%	16%	**Yes**
4	El Centro Avenue south of Leland Way	5,677	6,018	730	6,748	10.8%	8%	**Yes**

[a] *Future 2013 ADT volumes include a 6 percent increase from 2007 ADT volumes as well as traffic generated from the 94 related projects.*
[b] *Based on City of Los Angeles impact criteria for neighborhood street segments.*

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

Street driveway for exiting vehicles with a LOS D and estimated delay of 31 seconds in the A.M. peak hour and 24 seconds in the P.M. peak hour. Based on the acceptable levels of service at the project driveways, no significant access impacts would occur.

Furthermore, with regarding to the loading area, the location of the loading area minimizes potential traffic impacts on Gower Street and on Selma Avenue since trucks would not back into or out of the parking garage on public streets. Thus, impacts associated with loading operations and access would be less than significant. Mitigation Measure I-8 is also proposed to further reduce impacts.

(d) Congestion Management Program

(i) Intersections

The CMP intersection monitoring locations within the vicinity of the project site are the intersection of Santa Monica Boulevard and Western Avenue and the intersection of Santa Monica Boulevard and Highland Avenue. According to Metro's 2004 CMP for Los Angeles County, a TIA must be conducted at all CMP intersection monitoring locations where a project would add 50 or more trips during the A.M. or P.M. peak hours. Based on the project trip generation estimates presented in Table IV.I-7 above and review of the project traffic volumes shown in Figure 7 of the Traffic Study (refer to Appendix I), the

Table IV.I-9
Future Driveway Level of Service Analysis

Project Driveway	Intersection Control	A.M. Peak Hour Delay [a]	A.M. Peak Hour LOS	P.M. Peak Hour Delay [a]	P.M. Peak Hour LOS
Selma Avenue	Overall Intersection Average	3.3	A	5.1	A
Stop-Controlled (full movement)	Vehicles Exiting	13.4	B	14.8	B
El Centro Avenue	Overall Intersection Average	1.1	A	1.0	A
Stop-Controlled (full movement)	Vehicles Exiting	16.6	C	21.7	C
Gower Street	Overall Intersection Average	1.4	A	2.4	A
Stop-Controlled (right-in/right-out only)	Vehicles Exiting	30.5	D	24.1	C

[a] *Delay in seconds.*

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

project is not expected to add more than 50 vehicles per hour to either of these two intersections during the A.M. or P.M. peak hours. Therefore, a TIA is not required for either of these two intersections.

(ii) Freeways

The CMP freeway monitoring location within the vicinity of the project site is US-101 south of Santa Monica Boulevard. According to Metro's 2004 CMP for Los Angeles County, a TIA must be conducted at all CMP freeway monitoring locations where a project would add 150 or more trips in either direction during the A.M. or P.M. peak hours. Based on the project trip generation estimates presented in Table IV.I-7 above and trip distribution estimates shown in Figure 6 of the Traffic Study (refer to Appendix I), the project is estimated to result in a net increase of approximately 198 A.M. peak hour trips and 132 P.M. peak hour trips on US-101 south of Santa Monica Boulevard. Therefore, a TIA was conducted to determine potential impacts to the CMP freeway monitoring location. In addition to this CMP freeway monitoring location, three freeway segments (US-101 at Melrose Avenue, US-101 at Highland Avenue, and US-101 at Barham Boulevard) were analyzed in the Traffic Study due to their proximity to the project site and the number of trips to be generated at these locations. The results of the analysis are presented in Table IV.I-10 on page IV.I-35. As shown in Table IV.I-10, the project would increase the D/C ratio by a maximum of 0.019 (or 1.9 percent), which would be less than the significance threshold of 0.02 (or 2 percent). Therefore, the project would not create a significant impact at the CMP freeway monitoring location or the three freeway segments during the A.M. or P.M. peak hours. No mitigation measures are required.

Table IV.I-10
Future 2013 Freeway Segment Level of Service Without and With Project

Freeway Segment	Peak Hour	Direction	No. of Lanes	Capacity	Existing 2008 Demand[a]	Existing 2008 D/C	Existing 2008 LOS	Future 2013Without Project Demand	Future 2013Without Project D/C	Future 2013Without Project LOS	Project Trips	Future 2013 With Project Demand	Future 2013 With Project D/C	Future 2013 With Project LOS	D/C Increase	Significant Impact?
US-101 at Santa Monica Boulevard[b]	A.M.	NB	4	8,000	6,690	0.836	D	7,025	0.878	D	148	7,173	0.897	D	0.019	No
		SB	4	8,000	7,379	0.922	D	7,748	0.969	E	80	7,828	0.978	E	0.009	No
	P.M.	NB	4	8,000	6,690	0.836	D	7,025	0.878	D	95	7,120	0.890	D	0.012	No
		SB	4	8,000	7,379	0.922	D	7,748	0.969	E	131	7,879	0.985	E	0.016	No
US-101 at Melrose Avenue	A.M.	NB	4	8,000	7,043	0.880	D	7,395	0.924	D	148	7,543	0.943	E	0.019	No
		SB	4	8,000	7,768	0.971	E	8,156	1.020	F(0)	80	8,236	1.029	F(0)	0.009	No
	P.M.	NB	4	8,000	7,043	0.880	D	7,395	0.924	D	95	7,490	0.936	E	0.012	No
		SB	4	8,000	7,768	0.971	E	8,156	1.020	F(0)	131	8,287	1.036	F(0)	0.016	No
US-101at Highland Avenue	A.M.	NB	5	10,000	9,672	0.967	E	10,155	1.016	F(0)	53	10,208	1.021	F(0)	0.005	No
		SB	4	8,000	9,274	1.159	F(0)	9,738	1.217	F(0)	98	9,836	1.230	F(0)	0.013	No
	P.M.	NB	5	10,000	9,672	0.967	E	10,155	1.016	F(0)	87	10,242	1.024	F(0)	0.008	No
		SB	4	8,000	9,274	1.159	F(0)	9,738	1.217	F(0)	64	9,802	1.225	F(0)	0.008	No
US-101at Barham Boulevard	A.M.	NB	5	10,000	9,672	0.967	E	10,155	1.016	F(0)	58	10,208	1.021	F(0)	0.005	No
		SB	5	10,000	9,274	0.927	D	9,738	0.974	E	98	9,836	0.984	E	0.010	No
	P.M.	NB	5	10,000	9,672	0.967	E	10,155	1.016	F(0)	87	10,242	1.024	F(0)	0.008	No
		SB	5	10,000	9,274	0.927	D	9,738	0.974	E	64	9,802	0.980	E	0.006	No

[a] *Existing 2008 peak hour demand established via information published in Caltrans 2005 Traffic Volumes on California State Highways. The 2005 demand was increased to reflect 2008 demand (the baseline year used for the project).*
[b] *CMP freeway monitoring location.*

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

(iii) Public Transit Service

When excluding the 15 percent transit credit per LADOT, the project is estimated to generate 911 net new vehicle trips during the A.M. peak hour and 907 net new vehicle trips during the P.M. peak hour. Applying the average vehicle rider factor of 1.4, it is estimated that the project would result in 1,275 person trips during the A.M. peak hours and 1,270 person trips during the P.M. peak hours. Assuming the 15 percent transit credit applied to the project for its proximity to the Metro Red Line's Hollywood and Vine Station (located approximately one-quarter mile northwest of the project site), as well as the number of transit lines and routes that serve the Hollywood area, it is estimated that the project would generate191 new transit riders during both the A.M. and the P.M. peak hours.

The project site is located in close proximity to Metro Red Line's Hollywood and Vine Station, as well as a number of transit lines and routes that serve the Hollywood area. The Metro Red Line, which has 10-minute headways during the A.M. and P.M. peak hours, has a capacity of slightly over 6,000 persons during the A.M. and P.M. peak hours. Metro's headway service for local and express bus routes is between five and 12 minutes during the A.M. and P.M. peak hours. DASH operates with 30-minute headways during the A.M. and P.M. peak hours. The bus services have a seating capacity of approximately 4,385 persons during the A.M. and P.M. peak hours based upon the seating capacity of 40 persons for a standard bus and 65 persons for a Metro Rapid articulated bus. With a total seating capacity of approximately 10,400 persons in the peak hours, the project would utilize approximately 2 percent of the available transit capacity during the peak hours. Given this nominal percentage and the high level of transit services available in the project area, it is concluded that the project would result in less than significant impacts to public transit service. No mitigation measures are required.

(e) Parking

Section 12.21.A.4 of the LAMC as well as the City's Residential Parking Policy sets forth parking requirements for various land uses, which are presented in Table IV.I-11 on page IV.I-37. Based on these parking requirements, the project would be required to provide a total of 1,910 parking spaces (800 for residents, 200 for residential guests, and 910 for commercial and hotel uses) as shown in Table IV.I-11. It should be noted that in order to maintain a conservative analysis, all 400 residential units were assumed to be condominiums as the parking requirements for condominiums are higher than those of apartments. As shown in Table IV.I-11, the project proposes to provide 800 parking spaces for residents and 1,204 parking spaces for residential guests, commercial uses, and hotel uses for a total of approximately 2,004 parking spaces. Therefore, the project's parking supply would exceed LAMC parking requirements. Therefore, parking impacts would be less than significant.

Table IV.I-11
Required and Proposed Parking

Land Use	Amount	Parking Rate	Required Parking
Condominiums [d]	400 du		
Residents		2 spaces per du	800
Guest Parking		0.5 spaces per du [a]	200
Subtotal Condominiums			*1,000*
Commercial Office	380 ksf	2 spaces per 1,000 sf floor area [b]	760
Hotel	30 rm	1 space per room (first 30) [c]	30
	30 rm	1 space per 2 rooms (next 30) [c]	15
	65 rm	1 space per 3 rooms (beyond 60) [c]	22
Subtotal Hotel	*125 rm*		*67*
Restaurant & Bar I	20 ksf	2 spaces per 1,000 sf floor area [b]	40
Quick Service Restaurant	11 ksf	2 spaces per 1,000 sf floor area [b]	22
Retail	10.3 ksf	2 spaces per 1,000 sf floor area [b]	21
		Total Spaces Required	**1,910**
		Total Spaces Provided	**2,004**
		Surplus/(Shortfall)	**94**

[a] *Obtained from the Los Angeles Department of City Planning, Residential Parking Policy on Division of Land No. AA 2000-1, May 2000. The higher of the guest parking requirements is utilized (0.5 spaces per unit in congested parking areas).*
[b] *Obtained from the Los Angeles Municipal Code, Section 12.21A.4(x)(3), Hollywood Redevelopment Project Area, delineated by Ordinance, No. 161,202.*
[c] *Obtained from the Los Angeles Municipal Code, Section 12.21A.4(b).*
[d] *Residential units could be developed as condominiums or a combination of condominiums and apartments. However, no more than 50 percent of the units (i.e., 200 units) would consist of apartments. In order to maintain a conservative analysis, all 400 residential units were assumed to be condominiums as the parking requirements for condominiums are higher than those of apartments.*

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

(f) Consistency with Regulatory Framework

(i) Congestion Management Program

As analyzed above, the project would not result in significant impacts to the CMP intersection and freeway monitoring locations located in the vicinity of the project site. Moreover, the project would not result in significant impacts to public transportation in the area. Therefore, the project would be consistent with the CMP.

(ii) Hollywood Community Plan

Although the project would result in significant impacts to intersections and neighborhood street segments, it would support the Community Plan's transportation and land use objectives to locate new development within proximity to public transit and along a major transportation corridor. The development as proposed represents a mix of residential and commercial uses in accordance with the Hollywood Community Plan General Hollywood Center Policy. This vertically integrated mix of residential and commercial uses is intended to establish a more pedestrian-oriented environment within the project vicinity thereby reducing the overall amount of traffic generated in the area. The project also supports Hollywood Community Plan Objective 1 to further development of Hollywood as a major center of population, employment, retail services, and entertainment. Proposed development at this site would also support regional mobility goals by encouraging development in and around activity centers where existing public transportation is already in place, which would also assist in minimizing overall traffic in the area. Lastly, the project would implement mitigation measures to reduce traffic impacts. Thus, the project would be generally consistent with the intent of the Hollywood Community Plan.

(iii) Los Angeles Municipal Code

As described above, the project would provide sufficient parking in compliance with the LAMC and the City's Residential Parking Policy.

4. Cumulative Impacts

a. Construction

The construction of 94 related projects is anticipated in the project area. These 94 related projects are dispersed throughout the project area and draw upon a workforce from all parts of the Los Angeles region. The majority of the construction workers are anticipated to arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.), thereby avoiding generating trips during the A.M. and P.M. peak traffic periods. In addition, the haul truck routes for the related projects would be approved by LADOT according to the location of the individual construction site and the ultimate destination. LADOT's established review process would take into consideration overlapping construction projects and would balance haul routes to minimize the impacts of cumulative hauling on any particular roadway. Although the project would result in less than significant construction-related traffic impacts related to construction worker trips and truck trips, cumulative impacts are concluded to be significant and unavoidable due to the potential for concurrent construction of the related projects in the vicinity of the project site in conjunction with the project itself.

b. Operation

The traffic models utilized in the above analysis incorporated forecasted traffic increases due to ambient growth and related projects through the year 2013 (the build-out year of the project). Furthermore, the CMP analysis presented above evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections, neighborhood street segments, freeway segments, and the regional transportation system as a result of the project have been analyzed.

By comparing the future with project conditions to the existing conditions, increases in system-wide traffic volumes in the project vicinity are anticipated. It is anticipated that the individual related projects would be required to reduce potentially significant traffic impacts to the extent feasible. However, as no such guarantee exists in order to ensure that every project implements the required mitigation measures, it is conservatively concluded that cumulative development would yield a significant cumulative impact on intersection and roadway operations.

Impacts pertaining to project access are site-specific. In addition, the project would not result in access impacts. Thus, impacts associated with access would not be cumulatively considerable.

With regard to public transit, similar to the project, the related projects would generate an overall increase in transit riders. This effect is a positive impact and is consistent with City land use and transportation policies to reduce traffic. The increased transit ridership associated with the project and related projects is not expected to exceed the capacity of transit systems. Thus, cumulative impacts would be less than significant.

With regard to parking, it is anticipated that future related projects would be subject to City review to ensure that adequate parking and access would be maintained in the project vicinity. Therefore, cumulative impacts related to parking would be less than significant.

5. Mitigation Measures

a. Construction

With implementation of the project design feature, as well as compliance with regulatory requirements, construction-related traffic impacts would be less than significant. However, the following mitigation measure is recommended to ensure impacts remain less than significant.

Mitigation Measure I-1: Prior to the start of construction, the Project Applicant shall devise a Construction Staging and Traffic Management Plan to be implemented during construction of the project. The Construction Staging and Traffic Management Plan shall identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of demolition and construction activities associated with the project. The Construction Staging and Traffic Management Plan shall include but not be limited to, most, if not all, truck trips being scheduled during the first eight hours of the permitted construction work period (7:00 A.M. to 3:00 P.M.) to avoid generating trips during the P.M. peak period. Additionally, the plan shall identify off-site construction worker parking locations when on-site parking is not available. The Construction Staging and Traffic Management Plan shall be subject to final approval by LADOT.

b. Operation

(1) Intersections

The project would create a significant impact at 13 of the 27 study intersections during the A.M. and/or P.M. peak hours. Mitigation measures are available for eight of these 13 impacted intersections. Other mitigation measures were explored but were either rejected based on infeasibility or adverse secondary impacts (refer to Section, Other Environmental Considerations, of this Draft EIR and the Traffic Study provided in Appendix I for further discussion).

Mitigation Measure I-2: Vine Street & Sunset Boulevard: A closed-circuit television (CCTV) camera shall be installed at this intersection, fully mitigating the project's impact at this location. Traffic signal hardware upgrades are needed to provide for enhanced operation of the City's ATSAC signal system, and to allow LADOT to manage traffic in direct response to real-time traffic flow. The strategic placement of a CCTV camera affords LADOT with the ability to monitor vehicles and buses, and respond to incidents that cause excessive delays. These upgrades are expected to reduce the V/C ratio of an intersection by a minimum of 0.01.

Mitigation Measure I-3: El Centro Avenue & Hollywood Boulevard: A signal shall be installed at this intersection.

Mitigation Measure I-4: El Centro Avenue & Sunset Boulevard: Provide separate northbound and southbound left-turn lanes on El Centro Avenue. This mitigation would require re-striping the northbound and

southbound approaches on El Centro Avenue. The restriping on the south leg would result in a 12-foot southbound through lane, 10-foot northbound left-turn lane, and 12-foot northbound through lane. The restriping on the north leg would result in a 15-foot southbound through lane, 10-foot southbound left-turn lane, and 20-foot northbound through leg. This improvement would result in the loss of approximately eight metered on-street parking spaces on the north El Centro Avenue leg and seven metered spaces on the south El Centro Avenue leg.

As part of the mitigation, the traffic signal controller at this intersection will also be upgraded to a Type 2070. The traffic signals at many of the intersections within the City of Los Angeles currently operate using older Type 170 traffic signal controllers. Newer Model 2070 controllers provide for enhanced and real-time operation of the traffic signal timing. Type 2070 controllers allow LADOT to provide instant adjustments to the signal's timing parameters based on real-time traffic conditions. These traffic signal hardware upgrades are needed to provide for enhanced operation of the City's ATSAC signal system, and to allow LADOT to manage traffic in direct response to real-time traffic flow. Upgrade of the controllers is expected to reduce the V/C ratio of an intersection by a minimum of 0.01.

Mitigation Measure I-5: Gower Street & Franklin Avenue: Provide operational improvements to the signal to provide left-turn phasing for the east-west left-turn movements and an overlapping right-turn arrow for the northbound right turn.

As part of the mitigation, the traffic signal controller at this intersection will also be upgraded to a Type 2070 and a CCTV camera will be installed. The traffic signals at many of the intersections within the City of Los Angeles currently operate using older Type 170 traffic signal controllers. Newer Model 2070 controllers provide for enhanced and real-time operation of the traffic signal timing. Type 2070 controllers allow LADOT to provide instant adjustments to the signal's timing parameters based on real-time traffic conditions. These traffic signal hardware upgrades are needed to provide for enhanced operation of the City's ATSAC signal system, and to allow LADOT to manage traffic in direct response to real-time traffic flow. The strategic placement of a CCTV camera affords LADOT with the ability to monitor vehicles and buses, and respond to incidents that cause excessive delays. These upgrades are expected to reduce the V/C ratio of an intersection by a minimum of 0.01.

Mitigation Measure I-6: Gower Street and Selma Avenue: A signal shall be installed at this intersection. Due to the offset of the Selma Avenue east and west legs at Gower Street, split phasing would need to be provided for the eastbound and westbound Selma Avenue approaches. Additionally, to maintain left turns in the northbound and southbound directions, a protected leading phase would be provided for the northbound lefts beginning concurrent with the northbound through phase and a protected lagging phase would be provided for the southbound lefts, with left-turn pockets striped on both the northbound and southbound Gower Street approaches.

Mitigation Measure I-7: Bronson Avenue and Hollywood Boulevard: Restripe the south leg of the intersection to allow the addition of a northbound right-turn lane.

Mitigation Measure I-8: Bronson Avenue and Sunset Boulevard: Restripe the south leg of Bronson Avenue to add a southbound right-turn lane. The south leg of the intersection would result in a 14-foot northbound through lane, 12-foot northbound left-turn lane and a 24-foot southbound receiving lane. The north leg of the intersection would result in a 10-foot southbound right-turn lane, 10-foot southbound through lane, and 10-foot southbound left turn lane. The northbound receiving lane would be 18 feet. This improvement would result in the loss of approximately eight unmarked on-street parking spaces on the north Bronson Avenue leg and four unmarked spaces on the south Bronson Avenue leg.

As part of the mitigation, the traffic signal controller at this intersection will also be upgraded to a Type 2070. The traffic signals at many of the intersections within the City of Los Angeles currently operate using older Type 170 traffic signal controllers. Newer Model 2070 controllers provide for enhanced and real-time operation of the traffic signal timing. Type 2070 controllers allow LADOT to provide instant adjustments to the signal's timing parameters based on real-time traffic conditions. These traffic signal hardware upgrades are needed to provide for enhanced operation of the City's ATSAC signal system, and to allow LADOT to manage traffic in direct response to real-time traffic flow. Upgrade of the controllers is expected to reduce the V/C ratio of an intersection by a minimum of 0.01.

Mitigation Measure I-9: Gower Street & Sunset Boulevard: To partially mitigate the project's traffic impact at this location, however, the traffic signal controller will be upgraded to a Type 2070. The traffic signals at many of the intersections within the City of Los Angeles currently operate using older Type 170 traffic signal controllers. Newer Model 2070 controllers provide for enhanced and real-time operation of the

traffic signal timing. Type 2070 controllers allow LADOT to provide instant adjustments to the signal's timing parameters based on real-time traffic conditions. These traffic signal hardware upgrades are needed to provide for enhanced operation of the City's ATSAC signal system, and to allow LADOT to manage traffic in direct response to real-time traffic flow. Upgrade of the controllers is expected to reduce the V/C ratio of an intersection by a minimum of 0.01.

(2) Neighborhood Street Segments

The project would create a significant impact at three of the four neighborhood street segments. Mitigation of these impacts would require development and implementation of a neighborhood traffic management plan that would identify measures to make local routes less attractive to through traffic, such as turn restrictions, chokers or narrowing of street widths, diverters or semi-diverters, cul-de-sacs or street closures, speed humps, and stop signs. Because implementation of neighborhood traffic controls on one street can potentially cause intruding traffic to shift to other streets, an effective neighborhood traffic management plan can only be implemented on an areawide basis with all affected parties involved in development of the plan, including neighborhood residents, council representatives, planners, and traffic engineers.

The City of Los Angeles has a neighborhood traffic management process in place that includes a number of specific steps. In the event that neighbors are concerned with the potential impact of a project, they may petition LADOT for a neighborhood traffic study. If traffic conditions have changed and if LADOT staff believes the changes are attributable to the project, LADOT staff will work with the neighbors to identify traffic calming/traffic management improvements that would address the traffic problem. If the neighbors agree that the suggested solutions are workable, the improvements would be installed on a trial basis. Once the improvements have been in place for a sufficient trial period (usually six months), the neighbors would be asked if they want the improvements to be installed on a permanent basis. If a sufficient number of neighbors approve, the improvements would be installed permanently. Since the Project Applicant cannot unilaterally impose these measures, no feasible mitigation measures have been identified for the impacted neighborhood street segments.

(3) Project Access

As indicated above, access impacts would be less than significant. Notwithstanding, the following mitigation measures are recommended to further reduce impacts associated with access.

Mitigation Measure I-10: The Project Applicant shall use reasonable efforts to schedule truck deliveries during early morning hours so that trucks entering and exiting the parking structure do not interfere with vehicles accessing the parking structure during the typical A.M. and P.M. peak periods.

6. Level of Significance After Mitigation

a. Construction

With implementation of Mitigation Measure I-1, construction-related traffic impacts would be less than significant.

b. Operation

(1) Intersections

Table IV.I-12 on page IV.I-45 provides the V/C ratios and corresponding LOS for each impacted intersection upon implementation of the mitigation measures. As shown in Table IV.I-12, with implementation of mitigation measures, project impacts to six of the 13 impacted intersections would be reduced to a less than significant level.

For the intersection of Gower Street and Franklin Avenue, Mitigation Measure I-5 would mitigate the project impact to a less than significant level during the p.m. peak hour but not during the a.m. peak hour. While the mitigation would improve operations at this intersection to an acceptable LOS D during both the A.M. and P.M. peak hours, impacts to this intersection during the A.M. peak hour would be significant and unavoidable. In addition, for the intersection of Gower Street and Sunset Boulevard, Mitigation Measure I-9 would not fully mitigate during either peak hour. Due to physical constraints and/or adverse secondary impacts, impacts to the remaining five intersections would be significant and unavoidable (Argyle Avenue/Franklin Avenue & US-101 northbound on-ramp, Argyle Avenue & Hollywood Boulevard, Gower St. & US-101 southbound off-ramp, Gower Street & Hollywood Boulevard, Sunset Boulevard & US-101 southbound on-ramp). Thus, the project would result in significant and unavoidable impacts to a total of seven intersections. Please see Section VI, Other Environmental Considerations, as well as Appendix I of this Draft EIR for a discussion of why mitigation measures are infeasible for these significantly impacted intersections.

Table IV.I-12
Future 2013 Intersection Level of Service with Mitigation

No.	Intersection [a]	Peak Hour	Future 2013 Without Project V/C or Delay	LOS	Future 2013 With Project V/C or Delay	LOS	V/C or Delay Increase	Significant Impact?	Future 2013 With Project Mitigation V/C or Delay	LOS	Project Increase In V/C	Significant Impact?
1	Cahuenga Blvd. & Sunset Blvd.	A.M.	0.889	D	0.895	D	0.006	No				
		P.M.	0.852	D	0.860	D	0.008	No				
2	Vine St./Franklin Ave. & US-101 southbound off-ramp	A.M.	0.381	A	0.381	A	0.000	No				
		P.M.	0.445	A	0.445	A	0.000	No				
3	Vine St. & Hollywood Blvd.	A.M.	0.917	E	0.921	E	0.004	No				
		P.M.	1.187	F	1.192	F	0.005	No				
4	Vine St. & Selma Ave.	A.M.	0.452	A	0.501	A	0.049	No				
		P.M.	0.678	B	0.713	C	0.035	No				
5	Vine St. & Sunset Blvd.	A.M.	0.868	D	0.880	D	0.012	No	0.870	D	0.002	No
		P.M.	0.901	E	0.914	E	0.013	**Yes**	0.904	E	0.003	No
6	Argyle Ave./Franklin Ave. & US-101 northbound on-ramp	A.M.	0.849	D	0.866	D	0.017	No		No feasible mitigation		No
		P.M.	0.976	E	1.000	E	0.024	**Yes**				**Yes**
7	Argyle Ave. & Hollywood Blvd.	A.M.	0.625	B	0.629	B	0.004	No		No feasible mitigation		No
		P.M.	0.759	C	0.811	D	0.052	**Yes**				**Yes**
8	Argyle Ave. & Selma Ave.	A.M.	0.296	A	0.349	A	0.053	No				
		P.M.	0.437	A	0.525	A	0.088	No				
9	Argyle Ave. & Sunset Blvd.	A.M.	0.654	B	0.658	B	0.004	No				
		P.M.	0.721	C	0.728	C	0.007	No				
10	El Centro Ave. & Hollywood Blvd.[b]	A.M.	0.719	C	0.748	C	0.029	No	0.529	A	-0.190	No
		P.M.	0.986	E	1.015	F	0.029	**Yes**	0.742	C	-0.244	No
11	El Centro Ave. & Sunset Blvd.	A.M.	0.625	B	0.689	B	0.064	No	0.631	B	0.006	No
		P.M.	0.763	C	0.817	D	0.054	**Yes**	0.771	C	0.008	No
12	Gower St. & Franklin Ave.	A.M.	0.802	D	0.856	D	0.054	**Yes**	0.824	D	0.022	**Yes**
		P.M.	0.915	E	0.957	E	0.042	**Yes**	0.875	D	-0.040	No

Table IV.I-12 (Continued)
Future 2012 Intersection Level of Service with Mitigation

No.	Intersection [a]	Peak Hour	Future 2013 Without Project V/C or Delay	LOS	Future 2013 With Project V/C or Delay	LOS	V/C or Delay Increase	Significant Impact?	Future 2013 With Project Mitigation V/C or Delay	LOS	Project Increase In V/C	Significant Impact?
13	Gower St. & US-101 northbound off-ramp[b]	A.M.	0.366	A	0.403	A	0.037	No				
		P.M.	0.498	A	0.504	A	0.006	No				
14	Gower St. & US-101 southbound off-ramp[b]	A.M.	0.703	C	0.743	C	0.040	**Yes**		No feasible mitigation		**Yes**
		P.M.	0.601	B	0.622	B	0.021	No				No
15	Gower St. & Hollywood Blvd.	A.M.	0.837	D	0.900	D	0.063	**Yes**		No feasible mitigation		**Yes**
		P.M.	0.733	C	0.778	C	0.045	**Yes**				**Yes**
16	Gower St. & Selma Ave.[b]	A.M.	0.857	D	1.098	F	0.241	**Yes**	0.803	D	-0.054	No
		P.M.	0.658	B	0.845	D	0.187	**Yes**	0.605	B	-0.053	No
17	Gower St. & Sunset Blvd.	A.M.	0.976	E	1.021	F	0.045	**Yes**	1.011	F	0.035	**Yes**
		P.M.	0.871	D	0.960	E	0.089	**Yes**	0.980	E	0.079	**Yes**
18	Gower St. & Fountain Ave.	A.M.	0.844	D	0.851	D	0.007	No				
		P.M.	0.857	D	0.864	D	0.007	No				
19	Gower St. & Santa Monica Blvd.	A.M.	0.901	E	0.908	E	0.007	No				
		P.M.	1.028	F	1.035	F	0.007	No				
20	Bronson Ave. & Hollywood Blvd.	A.M.	0.759	C	0.789	C	0.030	No	0.789	C	0.030	No
		P.M.	0.904	E	0.931	E	0.027	**Yes**	0.831	D	-0.073	No
21	Bronson Ave. & Sunset Blvd.	A.M.	1.033	F	1.070	F	0.037	**Yes**	0.953	E	-0.080	No
		P.M.	1.187	F	1.221	F	0.034	**Yes**	1.124	F	-0.063	No
22	Hollywood Blvd. & US-101 southbound on-ramp/off-ramp	A.M.	0.744	C	0.774	C	0.030	No				
		P.M.	0.659	B	0.673	B	0.014	No				
23	Hollywood Blvd. & US-101 northbound on-ramp/off-ramp	A.M.	0.753	C	0.776	C	0.023	No				
		P.M.	0.633	B	0.653	B	0.020	No				

Table IV.I-12 (Continued)
Future 2012 Intersection Level of Service with Mitigation

			Future 2013 Without Project		Future 2013 With Project				Future 2013 With Project Mitigation			
No.	**Intersection** [a]	**Peak Hour**	**V/C or Delay**	**LOS**	**V/C or Delay**	**LOS**	**V/C or Delay Increase**	**Significant Impact?**	**V/C or Delay**	**LOS**	**Project Increase In V/C**	**Significant Impact?**
24	Sunset Blvd. & US-101 southbound on-ramp[c]	A.M.	0.688	B	0.719	C	0.031	No	No feasible mitigation			No
		P.M.	0.852	D	0.878	D	0.026	**Yes**				**Yes**
25	El Centro Ave. & De Longpre Ave.[b]	A.M.	0.243	A	0.258	A	0.015	No				
		P.M.	0.418	A	0.438	A	0.020	No				
26	Gower St. & De Longpre Ave.[b]	A.M.	0.744	C	0.754	C	0.010	No				
		P.M.	0.670	B	0.679	B	0.009	No				
27	El Centro Ave. & Fountain Ave.	A.M.	0.492	A	0.521	A	0.029	No				
		P.M.	0.522	A	0.557	A	0.035	No				

[a] *In accordance with standard LADOT procedures, the signalized intersections, which are currently operating under the ATSAC and ATCS systems, were given a total credit of 0.1 in V/C ratio (0.07 for ATSAC and 0.03 for ATCS) in this analysis.*
[b] *This intersection is stop-controlled. Analysis was performed assuming the CMA methodology and a reduced capacity of 1,200 vehicles per lane.*
[c] *This intersection is uncontrolled. Analysis was performed assuming the CMA methodology and a reduced capacity of 1,200 vehicles per lane.*

Source: Fehr & Peers, Traffic Study for the Columbia Square Mixed-Use Project, May 2009.

(2) Neighborhood Street Segments

Since the Project Applicant cannot unilaterally impose mitigation measures to address the impacts on the three impacted neighborhood street segments, impacts to the neighborhood street segments would be significant and unavoidable.

IV. Environmental Impact Analysis

J.1 Utilities and Service Systems - Water Supply

1. Introduction

This section addresses the expected water demand generated by the project and assesses whether there is sufficient water supply and infrastructure capacity to meet that demand. Water supply was analyzed using data provided in the Water Supply Assessment prepared by the Los Angeles Department of Water and Power, Water Resources Division dated January 17, 2008. The Water Supply Assessment is provided in Appendix J of this EIR.

2. Environmental Setting

b. Existing Conditions

(1) Water Supply

The Los Angeles Department of Water and Power (LADWP) is responsible for providing water within the City limits and ensuring that the water quality meets applicable California health standards for drinking water. Water is supplied to the City from four primary sources: local groundwater, the Los Angeles Aqueducts (LAA), the Metropolitan Water District (MWD), and recycled water. In addition to the local groundwater sources used throughout the City, LADWP operates the Los Angeles-Owens River Aqueduct and is a member of the MWD. Table IV.J-1 shows LADWP water supplies for the last ten years provided by local groundwater, LAA, MWD, and recycled water. As shown in Table IV.J-1, in 2008, LADWP had an available water supply of 642,011 acre feet (AF), of which approximately 23 percent of LADWP's water supply was from the LAA, approximately 9.4 percent from local groundwater, approximately 66.8 percent from the MWD, and less than one percent from recycled water.[1] Additionally, less than one percent was taken and stored in the reservoir system.

[1] *Los Angeles Department of Water and Power, Water Resources Division, March 25, 2009.*

Table IV.J-1
LADWP Water Supply

Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage	Total
1998	466,836	80,003	56,510	1,326	-7,769	596,906
1999	309,037	170,660	164,112	1,812	3,507	649,128
2000	255,183	87,946	336,116	2,200	-2,569	678,876
2001	266,923	79,073	309,234	1,636	1,994	658,860
2002	179,338	92,376	410,329	1,945	1,405	685,393
2003	251,942	90,835	322,329	1,759	-2,528	664,337
2004	202,547	71,831	391,834	1,774	2,958	670,944
2005	368,839	56,547	185,346	1,402	-3,140	608,994
2006	378,956	63,270	188,781	3,981	1,336	636,324
2007	129,400	89,018	439,436	3,674	-1,044	660,484
2008	147,365	60,149	429,110	7,051	-1,664	642,011

Note: Units are in AF

Source: Los Angeles Department of Water and Power, 2009.

(a) Los Angeles Aqueducts

Water supplies from the LAA originate from both streams and groundwater and can fluctuate yearly due to varying hydrologic conditions. LAA stream supplies are primarily collected from snowmelt runoff from the Eastern Sierra Nevada Mountains, which is conveyed to the City of Los Angeles via the LAA. The City holds water rights in the Eastern Sierra Nevada where the LAA supplies originate. Secondarily, LAA supplies come from groundwater pumping. In recent years, LAA supplies have been less than normal due to environmental obligations to restore Mono Lake and mitigate dust from Owens Lake. LADWP's ability to export Mono Basin water is now tied directly to the elevation of Mono Lake (which as of March 2009 is at 6,382 feet) and flows of various streams that are tributary to Mono Lake.[2] As such, when Mono Lake reaches its target elevation of 6,391 feet, exports from the Mono Basin can increase from their current level of 16,000 AF per year.[3]

[2] *Mono Lake Level, http://www.monolake.org/live/level.htm; accessed March 30, 2009.*

[3] *Mono Basin Clearinghouse, http://www.monobasinresearch.org/images/legal/d1631text.htm, accessed July 23, 2008.*

(b) Groundwater

LADWP extracts groundwater from various locations throughout the Owens Valley and four local groundwater basins: San Fernando, Sylmar, Central, and West Coast groundwater basins. As the LADWP owns extensive property in the Owens Valley, it appropriates groundwater for use in the Owens Valley and in Los Angeles. The water is collected and conveyed to Los Angeles via the LAA. The Owens Valley, which is located on the eastern slope of the Sierra Nevada Mountains, encompasses approximately 3,300 square miles of drainage area. Table IV.J-2 on page IV.J-4 shows the latest extractions by LADWP from Owens Valley. As shown therein, based on the most recent data available, LADWP extracted 60,337 AF of groundwater in 2006-2007.LADWP holds adjudicated extraction rights in the four local groundwater basins, meaning that the groundwater supplies and quantities have been assigned by the courts to existing users. However, the San Fernando and Sylmar Basins are subject to the judgment in the case of City of Los Angeles vs. City of San Fernando et al. Pumping is reported to the court-appointed Upper Los Angeles River Area (ULARA) Watermaster. The Central and West Coast Basins are also subject to court judgments. Pumping is reported to the California Department of Water Resources (DWR) who acts as Watermaster.

The San Fernando Basin, which consists of 112,000 acres of land and comprises 91.2 percent of the Upper Los Angeles River Area (ULARA) valley fill, is the largest of the four local basins within the ULARA. LADWP has an approximate entitlement of 87,000 AF in the San Fernando Basin. Sylmar Basin, located in the northern part of the ULARA, consists of 5,600 acres and comprises 4.6 percent of the ULARA valley fill. LADWP has an annual entitlement of 3,255 AF from the Sylmar Basin. LADWP additionally has adjudicated rights to extract groundwater from the Central and West Coast Basins. Annual entitlements to the Central and West Coast Basins are 15,000 AF and 1,503 AF, respectively. Currently, LADWP does not exercise its pumping rights at the West Coast Basin due to localized water quality issues.

Table IV.J-2 shows the latest extractions by LADWP from Owens Valley, and the San Fernando, Sylmar, Central, and West Coast Basins. As shown in Table IV.J-2, from 2007 to 2008, LADWP extracted 50,009 AF from the San Fernando Basin, 2,996 AF from the Sylmar Basin, and 10,754 AF from the Central Basin. Extraction from the basins will however be limited by water quality and overdraft protection. Currently, LADWP's groundwater pumping practice is based on a "safe yield" operation in which the amount of groundwater extractions, over a period of years, are extracted to the amount equal to the native an imported water that recharges.

(c) Metropolitan Water District of Southern California (MWD)

MWD is the largest water wholesaler for domestic and municipal uses in Southern California. All of MWD's 26 member agencies, including LADWP, have preferential rights

Table IV.J-2
LADWP Local Groundwater Basin Supply
(In Acre-Feet)

Year	Owens Valley	San Fernando	Sylmar	Central	West Coast
2001-2002	73,349	66,823	1,240	8,639	0
2002-2003	82,281	78,045	3,662	9,811	0
2003-2004	87,726	72,235	2,634	15,907	0
2004-2005	85,820	46,815	1,509	14,870	0
2005-2006	57,412	35,428	1,853	13,395	0
2006-2007	60,337	70,837	4,032	14,416	0
2008-2009	N/A	50,009	2,996	10,754	0

Note: Groundwater extractions for all basins, except Owens Valley groundwater basin, represent extractions during water year (October through September). Owens Valley groundwater extractions are reported from April to March.

Source: Los Angeles Department of Water and Power, 2009.

to purchase water from MWD. As a member agency, LADWP purchases water from MWD to supplement its water supplies from local groundwater and the LAA. In times of water supply shortage, LADWP is allocated a calculated amount of MWD water based on an allocation formula provided in the MWD Water Supply Allocation Plan (discussed later below). As indicated in Table IV.J-1, in 2008, LADWP received 429,110 AF from MWD. LADWP will continue to rely on MWD to meet its current and future supplemental water needs.

MWD imports a portion of its water supplies from Northern California through the State Water Project (SWP)'s California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct. Summaries of MWD's individual supplies, along with the challenges facing each supply, are presented below. Additionally, described below are specific actions that MWD is taking to meet each of the challenges facing its water supplies. Over the past several decades, MWD has demonstrated that it can adapt to continuous change and address uncertainties in supply by developing a diverse portfolio, setting supply targets, monitoring its progress on a regular basis, and adapting its strategy to meet its targets.

(i) MWD Water Supply

The Colorado River

MWD diverts water from the Colorado River at Lake Havasu on the California/Arizona border and conveys it across the Mojave Desert via the agency's Colorado River Aqueduct to Lake Mathews near Riverside. From there, MWD pumps the

water into its feeder pipeline distribution system for delivery to its member agencies throughout Southern California.

MWD possesses the right to divert water from the Colorado River pursuant to a contract with the U.S. Secretary of the Interior under Section 5 of the federal Boulder Canyon Project Act.

MWD was allotted 550,000 AF per year under a fourth priority right and 662,000 AF per year under a fifth priority right. Palo Verde Irrigation District, the Yuma Project, Imperial Irrigation District (IID) and the Coachella Valley Water District (CVWD) are the agricultural entities holding the first three priorities to the use of no more than 3.85 million acre-feet under the water delivery contracts. MWD also holds a contract to divert additional 180,000 acre-feet of surplus water on an annual basis.[4] Any water left unused by other California contractors with a higher priority than MWD would also be available. In addition to the potential supply available to MWD from the unused portion of California's normal apportionment, the Secretary of the Interior can allow MWD to divert water that is unused by Arizona and Nevada, as well as surplus water. In years in which surplus water is available, MWD would have the highest priority of any California contractor to divert that water by virtue of its fifth priority right. For 2009, MWD's estimate of Colorado River supplies is approximately 888,000 AF.[5]

To address the supplies of all California users of Colorado River water, including MWD, a Quantification Settlement Agreement (QSA) and other related agreements were approved On October 10, 2003. Conserved water transfer agreements between the various water rights holders are all part of the QSA and related agreements. These contracts identify the conserved water volumes and transfer schedules for IID along with the price and payment terms. As specified in the agreements, IID will transfer to SDCWA up to 200,000 AFY and to CVWD and MWD combined up to 103,000 AFY of water conserved from delivery system improvements and on-farm efficiency improvements, all in return for payments totaling billions of dollars. In addition, IID will transfer up to 67,000 AFY of conserved water from the lining of the All-American Canal to SDCWA and certain San Luis Rey Indian Tribes in exchange for the payment of all lining project costs and a grant to IID of certain rights to use the conserved water.

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[4] *Metropolitan Water District of Southern California, website, www.mwd.org; accessed March 24, 2009.*

[5] *Metropolitan Water District of Southern California, Report - Water Surplus and Drought Management Plan on Water Supply and Demand, as of February 20, 2009.*

Current challenges facing MWD's Colorado River supply include risk of continued drought in the Colorado River Basin and pending litigation that may threaten implementation of part or all of the QSA. MWD has been aggressively preparing for these two risks to its Colorado River supply for many years. Its responses to these challenges are described in detail below.

The Colorado River Basin has experienced below-normal runoff in recent years.

During 2008, Lake Mead was at its lowest level in over 40 years.[6] To address the receding lake levels, MWD participated in the "Intentionally Created Surplus" program to store water in Lake Mead for withdrawal during dry years. The program allowed MWD in 2006 to store 50,000 AF of water in Lake Mead that it had saved under the Palo Verde Irrigation District Land Management and Crop Rotation Program. Furthermore, in late December 2007, a series of four agreements were authorized by MWD that will determine how water shortages are shared along the Colorado River. The agreements will allow MWD the opportunity to store up to 1.5 million AF of conserved water in Lake Mead. Collectively, these programs are expected to maintain the reliability of MWD's Colorado River supplies.

The second challenge to MWD's Colorado River supplies is the pending litigation concerning the QSA and related agreements. That litigation has taken two forms: (1) a series of lawsuits against the lining of the All-American Canal; and (2) a series of lawsuits which challenge the IID/SDCWA transfer. The All-American Canal litigation has been litigated and resolved in favor of the QSA parties thus, increasing the certainty of MWD's Colorado River supplies .[7]

Nine lawsuits against the IID/SDCWA transfer were brought by the County of Imperial, various landowners within IID and environmental advocacy groups, and have been consolidated in Sacramento County Superior Court. Many of the lawsuits have been dismissed except for the lawsuits pertaining to environmental laws still pending. While all significant issues in the QSA litigations have been resolved in favor of MWD and the other QSA parties to date, including the entire All-American Canal case, it is impossible to predict

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[6] *U.S. Department of Interior, Bureau of Reclamation, Lake Mead at Hoover Dam Elevation, http://www.usbr.gov/lc/region/g4000/hourly/mead-elv.html; accessed March 24, 2009.*

[7] *On April 6, 2007, the U.S. Court of Appeals for the Ninth Circuit dismissed the challenge to the lining of the All-American Canal and lifted the court-imposed injunction that for a period of time halted construction. The ruling allowed IID to commence work on the project to conserve water lost by seepage from the existing earthen canal. See Consejo de Desarrollo Economico de Mexicali, A.C. v. United States, 482 F.3d 1157 (2007).*

with absolute certainty how the remaining litigation will be resolved. MWD is actively involved in the litigation and plans to defend the QSA fully to prevent any impacts to its Colorado River supplies. Programs that will help to implement the QSA and meet Colorado River water supply targets and that are currently in operation, close to completion or in progress include: the Imperial Irrigation District and MWD water conservation and transfer program; the Coachella and All-American Canal lining projects; the IID and San Diego County Water Authority (SDCWA) water transfer; the Palo Verde Irrigation District land management and crop rotation program; and the Interim Surplus Guidelines adopted by the U.S. Secretary of the Interior. MWD is actively working to implement several of these QSA-related programs.

State Water Project

The State Water Project (SWP) is a water storage and delivery system of reservoirs, aqueducts including the California Aqueduct, power plants, and pumping plants, that extend for 600 miles. The main purpose of the SWP is to divert and store surplus water during wet periods and distribute it to areas throughout the state. Other purposes of the SWP include flood control, power generation, recreation, fish and wildlife protection, and water quality management in the Sacramento-San Joaquin River Delta (Delta). The SWP relies on Delta channels as a conduit to move water from the Sacramento River inflow to the points of diversion in the south Delta. Thus, the Delta is part of the SWP conveyance system, making the Delta a key component in SWP deliveries.

The availability of SWP water supply is analyzed in terms of Table A and Article 21 water deliveries. Table A water deliveries represent the schedule of the maximum amount of water that water contractors to the DWR may receive annually from the SWP. There are 29 water contractors, inclusive of MWD, who have signed long term contracts with the DWR for a total of 4.173 million acre feet per year. Of the 29 contractors, 26 receive their deliveries from the Delta with a maximum SWP Table A amount of 4.133 million acre feet per year. All contracts are in effect to at least 2035. Table A deliveries are not guarantees of annual delivery amounts but are used to allocate individual contractors' portion of the delivery amounts available. Article 21 deliveries refer to Table A deliveries with additional water supplies received only under the following conditions: the water is available only if it does not interfere with Table A allocations and SWP operations; the water is available only when there is excess water in the Delta; the water is only available when conveyance capacity is not being used for SWP purposes or scheduled SWP deliveries; and the water must be stored by the contractor and not in the SWP system.

MWD possesses a contract with DWR that entitles it to water from the SWP.[8] For 2009, MWD's share of the total SWP supply is 382,300 AF.[9],[10] This supply is diverted from the Feather River at Lake Oroville, released and conveyed through the Sacramento-San Joaquin River Delta (Delta) and rediverted at the Harvey O. Banks Delta Pumping Plant for conveyance through the California Aqueduct to Southern California and MWD.

In recent years, SWP supplies have been challenged through environmental litigation concerning the Delta. Specifically, the amount of water from the SWP that MWD will be able to supply to Southern California in the near future is uncertain given the federal court case *Natural Resources Defense Council, et al. vs. Kempthorne, et al.* (*NRDC*). In Spring 2007, various environmental groups sought to halt the operation of water pumps in the Delta to protect the Delta smelt and other endangered fish species living in the Delta. In May 2007, a federal court invalidated the Biological Opinion issued by the U.S. Fish & Wildlife Service, which had held that the Delta smelt were in "no jeopardy" from operational changes of the State Water Project in the Delta. On May 31, 2007, DWR voluntarily shut down the SWP's pumps for 17 days in an effort to protect the Delta smelt. In an August 2007 oral decision, the federal court agreed to institute interim protective measures that restrict water operations in the Delta, including reducing the amount of water being pumped out of the Delta between the end of December and June. In December 2007, the federal court issued an interim remedial order, requiring the U.S. Fish & Wildlife Service to revise its Biological.[11] This new Biological Opinion was completed in December 2008 and concluded that the concurrent operations of the Central Valley Project and the SWP are likely to jeopardize the continued existence of the Delta smelt. As indicated in the Biological Opinion, the U.S. Fish & Wildlife Service developed a Reasonable and Prudent Alternative (RPA) to ensure that long-term operations of the Central Valley Project and SWP do not appreciably reduce the likelihood of the survival and recovery of the Delta smelt. The RPA calls for the ongoing monitoring of flows, turbidity, and other parameters to minimize impacts to Delta smelt. Based on these parameters, minimum flows to the Delta

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[8] *See Contract Between the State of California Department of Water Resources and the Metropolitan Water District of Southern California For a Water Supply (November 4, 1960), as amended through Amendment No. 28, available at http://www.swpao.water.ca.gov/wsc/pdfs/MWDSC_O_C.pdf.*

[9] *Department of Water Resources, State Water Project Allocation Increase, March 2009.*

[10] *Late winter storms in 2008-2009 increased snowpack to near 90 percent of normal, but water storage in the state's major reservoirs and runoff projections remain well below average. The precipitation allowed a 5 percent increase (i.e., a 20 percent allocation) from the initial SWP Table A deliveries allocation of 15 percent set in December 2008.*

[11] *The court had ordered revision of the Biological Opinion by September 15, 2008 and conditioned Delta operations on various requirements. The court, on August 29, 2008, granted a request by the U.S. Fish & Wildlife Service to extend the due date of the new Biological Opinion to December 15, 2008.*

shall be recommended. Depending on conditions, recommended minimum flows to protect the Delta smelt may curtail a portion of the SWP water supplies to Southern California.

(ii) MWD Programs

Delta Programs

At present, both the California state government and MWD are evaluating Delta operations and options to address Delta smelt impacts and other environmental concerns. The CALFED Bay-Delta Program is a unique collaboration among 25 state and federal agencies that came together with a mission to improve California's water supply and the ecological health of the Delta. In addition, the Governor's Delta Vision process and the Bay-Delta Conservation Plan (BDCP) are both focused on finding and implementing long-term solutions for the Delta. The purpose of the Delta Vision Process is to identify a strategy for managing the Delta as a sustainable ecosystem to continue to support the State's important environmental and economic functions. The Delta Vision Process entailed the completion of two work products as prepared by phase. Phase I work product is the Delta Vision Report, which was completed in December 2007. The Delta Vision Report includes long-term strategic solutions for the conflicts in the Delta as recommended by the Delta Vision task force established by Governor Schwarzenegger. Phase II work product is the Delta Strategic Plan, which was adopted and completed in October 2008. The Strategic Plan assesses alternative implementing measures and management practices to implement the Delta Vision Report recommendations. The Strategic Plan includes modifications to existing land uses and services in the Delta, and will assess governance, funding mechanisms, water resource uses and ecosystem management practices. Following the completion of these two work products, the Delta Vision Committee prepared the Delta Vision Implementation Report in December 2008. The Implementation Report draws on the recommendations contained in the Strategic Plan, and provides a summary of fundamental actions to be undertaken in the next two years. Additionally, the Implementation Report lists a number of strategies to support the fundamental actions.

Additionally, the BDCP is being developed to resolve the conflict between fishery protection under state and federal Endangered Species acts and water operations of the SWP and Central Valley Project. The BDCP would allow water contractors, who must comply with the federal and State Endangered Species Acts (ESAs), to work cooperatively to attain incidental take coverage via a habitat conservation plan and natural community conservation plan. Development of this plan is now underway under the aegis of the California Resources Agency, with the appropriate permits and completion of the first public

draft of the plan expected in late 2009.[12] MWD is one of the parties that are drafting the BDCP to provide State and federal ESA coverage for its SWP operations.

Furthermore, in May 2007, MWD's Board adopted a Bay Delta Action Plan as a framework to address water supply risks in the Delta both for the near- and long-term. The near- and mid-term actions outlined in the Delta Action Plan are intended to implement measures to reduce fishery and earth-quake related risks, such as aggressive monitoring, ecosystem restoration, local water supply projects, and emergency preparedness and response plans.

MWD is also focusing on voluntary Central Valley storage and transfer programs to bank MWD's SWP water supplies. These programs include the Arvin Edison Storage Program, Semitropic Storage Program, Kern Delta Storage Program, and the Mojave Storage Program. As of January 1, 2009, MWD had 97,000 AF of available water supply within the Central Valley Banking Programs.

At the regional and local levels, numerous water decision-makers are actively addressing the threats facing the Delta. A review of MWD's resource development programs demonstrates that although SWP supplies are facing challenges and may become more expensive based on the cost of ultimately adopted solutions, MWD's adaptive planning framework, which includes conservation, in-region surface water storage, groundwater storage programs, and local water production within the MWD area, will allow MWD to adapt to changing conditions and ensure a reliable, diverse water supply to its members agencies that supply water to municipal customers. MWD has spent the past decade increasing the capacity of its reservoirs and its overall water reserve is several times larger than it was during the 1991-1992 drought. Further, actions that are being taken by the CALFED process and the State should enhance reliability of the SWP supplies in the future. Both MWD and State agencies are aware of changing conditions that may impact the SWP and are planning accordingly to ensure a safe, reliable supply of SWP water.

(d) Water Conservation and Recycling

In order to meet future water demands, water conservation and recycling will play an increasing role in the LADWP. LADWP has implemented conservation and recycling programs with efforts to further promote and increase the level of such programs. LADWP

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[12] *Bay Delta Conservation Plan Process Overview, http://resources.ca.gov/bdcp/docs/Process_Overview.pdf; accessed March 26, 2009*

is committed to supply a higher percentage of the City's water demand through conservation and recycling. LADWP works closely with MWD, the City's Bureau of Sanitation, other regional water providers, and various stakeholder groups to develop and implement programs that reduce overall water use. In addition, as discussed above, the Mayor and LADWP has recently prepared "Securing L.A.'s Water Supply", which is a plan for creating sustainable sources of water for the future of Los Angeles. This plan is an aggressive multi-pronged approach that includes: investments in state-of-the-art technology; a combination of rebates and incentives; the installation of smart sprinklers, efficient washers and urinals; and long-term measures such as expansion of water recycling and investment in cleaning up the local groundwater supply. These strategies will ensure a reliable water supply for Los Angeles residents and businesses.

(2) Water Demand

LADWP's 2005 UWMP projections in five-year increments from 2010 to 2030 are based on projected population estimates provided by SCAG. As presented in Table IV.J-3 on page IV.J-12 the projected water demand for the City of Los Angeles from the year 2000 through 2030 shows that the yearly water demand is projected to increase linearly by approximately 17,000 AF per year (AFY).[13] The City's water demand for the year 2030 is forecasted to be approximately 776,000 AFY. Utilizing the current demand per capita provides a conservative estimate of projected future water demand to ensure that water supplies are available to meet projected demands. The LADWP also anticipates adequate water supplies would be available to the service areas under normal, single dry, and multiple dry year conditions through 2030.

The existing uses on the project site include approximately 136,233 square feet of office/studio uses and 121,670 square feet of parking. Recently, three structures comprising 3,079 square feet located in the northern portion of the site fronting Selma Avenue were demolished. These three buildings were utilized as offices at the time of the Notice of Preparation (NOP) for the Draft EIR.[14] Therefore, the water use is taken into account. As estimated by the LADWP, based on the total of 139,312 square feet of office/studio uses and 121,670 square feet of parking that existed at the time of the NOP,

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[13] *This approximate water demand increase also includes the year 2000 which was based on dry weather conditions, while the other year projections are based on normal weather conditions.*

[14] *At the time of the Notice of Preparation for the project, the project site included these three buildings which were utilized as offices. Since then, however, these buildings have been demolished. However, as CEQA Guidelines Section 15125 generally defines baseline conditions as those which existed at the time of the NOP, the office uses of these buildings are taken into account within this Draft EIR.*

Table IV.J-3
LADWP Water Demand Projections for 2000 – 2030
(Thousand AFY)

Water Use Sector	2000	2005	2010	2015	2020	2025	2030
Single-Family	240	231	237	239	250	260	262
Multi-Family	199	198	205	219	228	236	250
Commercial	112	119	126	130	134	137	140
Government	41	43	44	44	45	45	46
Industrial	24	20	19	19	19	19	19
Non-revenue	60	48	50	52	55	57	58
Total	**677**	**661**	**683**	**705**	**731**	**755**	**776**

[a] *2000 represents actual year data (which was considered dry); 2005 through 2030 are projected based on normal weather conditions and with projected conservation.*

Source: Los Angeles Department of Water and Power, 2005 Urban Water Management Plan.

the project site had an existing water use demand of approximately 29,181 gallons per day (gpd) or 33 AF per year, as presented in Table IV.J-4 on page IV.J-13.

(3) Water Infrastructure

The water infrastructure serving the project site consists of domestic water mains located in the City streets surrounding the project site. This includes a 10-inch water main in Sunset Boulevard and 8-inch water mains located in Gower Avenue, Selma Avenue, and El Centro Avenue.

Water for fire fighting purposes is supplied to the project site via existing LADWP water mains and fire hydrants located within adjacent streets. There are three fire hydrants located adjacent to the project site, along the eastern perimeter. Please refer to Section IV.H.1, Fire Services, for additional information regarding the project's fire flow requirements as they relate to LAFD's fire suppression capabilities.

b. Regulatory Framework

(1) State

(a) Senate Bill 610 and Senate Bill 221

State legislation addressing water supply, Senate Bill (SB) 610 (Costa) and SB 221 (Kuehl), became effective January 1, 2002. SB 610, codified in the California Water Code (CWC), §10910 et seq., describes requirements for both water supply assessments and

Table IV.J-4
Existing Estimated Water Use

Land Use	Quantity	Water Use Factor [b] (gpd/sf)	Water Use (gpd)	Acre-Feet Per Year (AFY)
Existing				
Office/Studio	139,312 [a]	0.15	2,897	23
Parking	121,670 sf	0.02	2,433	3
Outdoor Water Use [c]			5,851	7
Subtotal			**29,181**	**33**

[a] *Includes approximately 3,079 sf of office uses which were removed. At the time of the Notice of Preparation for the project, the project site included these three buildings which were utilized as offices. Since then, however, these buildings have been demolished. However, as CEQA Guidelines Section 15125 generally defines baseline conditions as those which existed at the time of the NOP, the water use of these office uses are taken into account.*

[b] *Based on Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table dated 3/20/2002. Uses not listed are estimated by the closest type of use available in the table.*

[c] *Estimated to be 28% of indoor usage for commercial use, 18% for multi-family residential uses.*

Source: Water Supply Assessment for the Columbia Square Project, Los Angeles, Department of Water and Power, Water Resources Division, January 17, 2008.

Urban Water Management Plans (UWMP) applicable to the CEQA process. SB 610 requires that for specified projects subject to CEQA, the urban water supplier must prepare a water supply assessment that determines whether the projected water demand associated with a proposed project is included as part of the most recently adopted UWMP. Specifically, a water supply assessment shall identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' water deliveries received by the public water system. In addition, it must address water supplies over a 20-year period and consider average, dry, and multiple dry years. In accordance with SB 610 and Section 10912 of the Water Code, projects subject to CEQA requiring submittal of a water supply assessment include the following:

- Residential developments of more than 500 dwelling units.
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space.
- Hotels, motels, or both, having more than 500 rooms.

- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.

- Mixed-use projects that include one or more of the projects specified in this subdivision.

- A project that would demand an amount of water equivalent to or greater than the amount of water required by a 500 dwelling unit project.

The water supply assessment must be approved by the public water system at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the water supply assessment.

In addition, under SB 610, an urban water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past five years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

SB 221 also addresses water supply in the land use planning process and focuses on new residential subdivisions in non-urban areas. SB 221 requires that written verification from the water service provider be submitted indicating sufficient water supply is available to serve a proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are or will be available prior to completion of a project. SB 221 specifically applies to residential subdivisions of 500 units or more. In addition, Government Code Section 66473.7(i) exempts "…any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses, or where the immediate contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses, or housing projects that are exclusively for very low and low-income households."

The project is subject to the requirements of SB 610 since the project includes more than 250,000 square feet of commercial floor area and would generate a demand for water that would be greater than the demand generated by 500 residential units. The project does not propose development of 500 or more dwelling units and the project site is located within an urbanized area. Therefore, the project is not subject to the requirements of SB 221.

(b) California Urban Water Management Plan Act

The California Urban Water Management Planning Act (CWC Division 6, Part 2.6, Sections 10610-10656) addresses several state policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The Act also requires water suppliers to develop water management plans every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple dry years. Specifically, municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 acre-feet (AF) per year of water must adopt an UWMP.

(c) California Code of Regulations

Title 20, Sections 1605.1(h) and 1605.1(i) of the California Code of Regulations (CCR), establishes efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. Accordingly, the maximum flow rate for showerheads and lavatory faucets are 2.5 gallons per minute (gpm) at 80 pounds per square inch (psi) and 2.2 gpm at 60 psi, respectively. In addition, Section 1605.3(h) establishes state efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

(d) Global Warming and Climate Change

Global warming and climate change should be considered in assessing water supply in California. Potential impacts of climate change on California's water resources include changes in both water and air temperature, changes in precipitation patterns, and changes in sea levels that could increase pressure on Delta levees. The impact of climate change on California's water supply has already been the subject of study. California Department of Water Resources (DWR) prepared a July 2006 report entitled "Progress on Incorporating Climate Change into Management of California's Water Resources," which found that climate change may have a significant effect on California's future water resources and demand. This report also examined the potential impacts of selected climate change scenarios on operations of the SWP and Central Valley Project, Delta water quality, flood management and evapotranspiration. Potential issues include a reduction of Sierra snow pack and seasonal water storage; increased rain and less snow impacting supply reliability and hydropower generation; increased variable precipitation and extreme weather events; and rising sea levels.

While climate change is expected to continue through at least the end of this century, the magnitude and nature of future changes are uncertain. This uncertainty serves to complicate the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood

(DWR report at pg. 2-54). However, the State Water Project Delivery Reliability Report 2007 prepared by DWR indicates that, depending on climate change conditions, average yearly SWP Table A deliveries in 2027 would be reduced by 31 to 34 percent.[15] In addition, a survey of recent research on the effects of climate change on the Colorado River reveals that runoff reductions range from a decrease of 11 percent in 2010 to a decrease of 45 percent by approximately 2050.

Both governmental agencies and non-governmental organizations recommend that water decision-makers operate existing water systems to allow for increased flexibility as a result of climate change conditions. Other recommendations include incorporating climate change research into infrastructure design, conjunctively managing surface water and groundwater supplies, and integrating water and land use practices. As a result, in March 2002, MWD's Board of Directors adopted climate change policy principles that relate to water resources. These principles are reflected in MWD's 2004 IRP. Further, in response to climate change and uncertainty, MWD's UWMP incorporates three basic elements to promote adaptability and flexibility, important in addressing impacts of climate change: conservation, groundwater recharge, and water recycling.

Policymakers and water suppliers in California, including MWD, are currently addressing climate change impacts and developing new ways to cope with the types of variability which are outside the design range of existing infrastructure. MWD recognizes that climate change will require water suppliers to develop new, alternative water supplies and to focus on water use efficiency. In March 2002, MWD's Board of Directors adopted climate change policy principles that relate to water resources. These principles are reflected in MWD's water supply planning efforts, including the IRP. Further, in response to climate change and uncertainty, MWD's 2005 Regional UWMP incorporated three basic elements to promote adaptability and flexibility, important in addressing impacts of climate change: conservation, groundwater recharge, and water recycling.

Most recently, MWD approved criteria to further explain its position on the conveyance options that are currently being discussed to remedy the Delta, which include addressing projected sea level rise and change in inflows due to climate change. MWD's criteria provide that, "whatever option is chosen, it should provide water supply reliability, improve export water quality, allow flexible pumping operations in a dynamic fishery

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[15] *Table A water deliveries represent the schedule of the maximum amount of water that water contractors to the DWR may receive annually from the SWP. There are 29 water contractors who have signed long term contracts with the DWR for a total of 4.173 million acre feet per year. Table A deliveries are not guarantees of annual delivery amounts but are used to allocate individual contractors' portion of the delivery amounts available.*

environment, enhance the Delta ecosystem, reduce seismic risks, and reduce climate change risks." (Report for Metropolitan Water District of Southern California Board Meeting September 11, 2007 Agenda Item 8-4.) MWD has demonstrated a commitment to addressing climate change by evaluating the vulnerability of its water systems to global warming impacts and has developed appropriate response strategies and management tools that account for the impacts of climate change on future water supplies. For further discussion on the effects of global climate change, please refer to Section IV.B, Air Quality.

(2) Regional

Based on the water supply planning requirements imposed on its member agencies and ultimate customers, such as the requirements to adopt urban water management plans, water supply assessments and written verifications, MWD has adopted a series of official reports on the state of its water supplies. As described below, in the *Report on Metropolitan Water Supplies: A Blueprint for Water Reliability*, MWD has consistently stated that its water supplies are fully reliable to meet the demands of its customers, including LADWP, in all hydrologic conditions through at least 2030. In response to recent developments in the Delta, MWD is also engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies. In the near-term, MWD will continue to rely on the plans and policies outlined in its *Regional Urban Water Management Plan, Water Surplus and Drought Management Plan*, *Water Supply Allocation Plan,* and *Integrated Resources Plan* to address water supply shortages and interruptions (including potential shut downs of SWP pumps) to meet water demands. These plans are described in detail below.

(a) Report on Metropolitan Water Supplies: A Blueprint for Water Reliability

In March 2003, MWD published the *Report on Metropolitan Water Supplies: A Blueprint for Water Reliability* (Blueprint Report). The objective of the Blueprint Report was to provide member agencies, retail water utilities, cities, and counties within the MWD service area with information that may assist in their preparation of UWMP, water supply assessments, and written verifications. The Blueprint Report stated that the approach taken to evaluate water supplies and demands was consistent with MWD's 2000 Regional UWMP. MWD utilized Southern California Association of Governments' (SCAG) regional growth forecast in calculating regional water demands for its service area, which was the same method used by the LADWLP in its 2005 UWMP. Thus, MWD considered the water demands of LADWP in the Blueprint Report.

The Blueprint Report fully discusses MWD's historical and projected deliveries of Colorado River and SWP water. The conclusion of the Blueprint Report and supplemental information published by MWD, such as its IRP and annual Implementation Reports, is that

with its current water supply portfolio and planned actions, MWD will have sufficient water to meet the water demands of its customers for the next 20 years.

By comparing total projected water demands and conservatively estimating water supplies over the next 20 years, MWD has found that if its supply programs were implemented under its IRP "[b]ased on water supplies that are currently available, Metropolitan already has in place the existing capability to…[m]eet 100 percent of its member agencies' projected supplemental demands (consumptive and replenishment) over the next 20 years" in average, wet, multiple dry, and single dry years. In multiple dry years, MWD reports that it will "[m]eet 100 percent of its member agencies' projected supplemental demands (consumptive and replenishment) even under the repeat of the worst multiple year drought event over the next 15 years," while in a single dry year it can "[m]eet 100 percent of its member agencies' projected supplemental demands (consumptive and replenishment) even under the repeat of the worst single year drought event over the next 15 years." MWD's additional reserve supplies will provide a "margin of safety to guard against uncertainties in demand projections and risks in fully implementing all supply programs under development."

(b) 2005 Regional Urban Water Management Plan (RUWMP)

Pursuant to the Urban Water Management Planning Act, MWD prepared the 2005 RUWMP, which addresses the future of MWD's water supplies and demand through the year 2030. Campaigns for voluntary conservation, curtailment of replenishment water and agricultural water delivery are some of the actions outlined in the RUWMP to meet future water demand. If necessary, reduction in municipal and industrial water use and mandatory water allocation could be implemented. The RUWMP incorporates much of the actions and policies provided in MWD's *Water Surplus and Drought Management Plan* and *Integrated Resources Plan.*

(c) Water Surplus and Drought Management Plan (WSDM)

In 1999, MWD incorporated the water shortage contingency analysis that is required as part of any urban water management plan into a separate, more detailed plan, called the WSDM. That plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's Integrated Resources Plan. The WSDM also "identifies the expected sequence of resource management actions that [MWD] will execute during surpluses and shortages to minimize the probability of severe shortages and eliminate the possibility of extreme shortages and shortages allocations." MWD's 10 year WSDM categorizes its ability to deliver water to its customers by distinguishing between surpluses, shortages, severe shortages and extreme shortages. The WSDM's integration of management actions taken during times of surplus and shortages reflects MWD's belief that these actions are interrelated.

For example, MWD's regional storage facilities, such as Lake Skinner, Lake Mathews and Diamond Valley Lake, along with storage capacity available to MWD in Castaic Lake and Lake Perris, provide MWD with flexibility in managing its supplies. MWD's storage supplies and existing management practices allow MWD to mitigate shortages without having to impact retail municipal and industrial demands, except in severe or extreme shortages. MWD's 2005 RUWMP shows its expected ability to meet demands in single dry years by water supply source. For example, in 2010 MWD expects to have 831,000 AF in potential reserve and replenishment supplies, primarily through in-basin storage. In 2030, MWD estimates that it will have 716,000 AF in potential reserve and replenishment supplies. Anytime MWD withdraws from storage to meet demands, it is considered to be in a shortage stage. MWD has spent decades building up its storage reserves and groundwater management programs in order to prepare for a seven stages of shortage conditions. "Each [shortage] stage is associated with specific resource management actions designed to (1) avoid an Extreme Shortage to the maximum extent possible and (2) minimize adverse impacts to retail customers if an Extreme Shortage occurs." MWD notes that the "overriding goal of the WSDM Plan is to never reach Shortage Stage 7, an Extreme Shortage."

In an actual shortage, MWD would: (1) draw on storage out of reservoirs; (2) draw on out-of-region storage in the Semitropic and Arvin-Edison groundwater banks; (3) reduce or suspend long-term seasonal and groundwater replenishment deliveries; (4) draw on groundwater storage programs; (5) draw on SWP terminal reservoir storage; (6) reduce Interruptible Agricultural Water Program (IAWP) deliveries; (7) call on water transfer options contracts; (8) purchase additional water; and (8) reduce imported supplies to its members agencies by an allocation method. MWD clarifies that this list is not in any particular order, "although it is clear that the last action [taken] will be the curtailment of firm deliveries to the member agencies."

Additionally, the MWD announced a strategic approach in 2008 regarding its WSDM Plan. MWD's major strategies are as follows:

- Continue conservation campaign;
- Maximize recovery of water from Central Valley storage and banking programs;
- Purchase additional supplies to augment existing supplies; and
- Develop and implement a shortage allocation plan (discussed below).

(d) Water Supply Allocation Plan.

While the WSDM included a set of general actions and considerations for MWD staff to address during shortage conditions, it did not include a water supply allocation plan or

implementation approach. Therefore, MWD adopted a water supply plan called the Water Supply Allocation Plan in February 2008. This plan includes a formula for determining reductions of water deliveries to member agencies during shortage conditions (i.e., drought conditions or unforeseen cuts in water supplies). The formula was derived for three scenarios of regional water shortage levels (10, 20, and 40 percent shortage) and is based on a methodology that cuts water allocations all across the board (i.e., to all member agencies) with adjustments for the member agency's dependency on MWD's water supplies and the agency's water conservation savings from programs and devices. The formula also calls for IAWP water reductions of between 30 to 100 percent, depending on the severity of the shortage conditions. The allocation period covers 12 months from July of a given year through the following June. Member agency allocations would be enforced through a penalty rate structure.

Relative to a member agency's preferential water rights, the Water Supply Allocation Plan provides for a discounted penalty rate schedule for member agencies exceeding their allocations under the plan's formula but not exceeding their preferential rights. The Water Supply Allocation Plan would be reviewed and revised in three years following the February 2008 adoption as well as 12 months after a shortage.[16]

(e) Integrated Resources Plan

MWD first adopted its Integrated Resources Plan (IRP) in 1996. The IRP is updated every five years. The most updated IRP, which was adopted in 2004, discussed local water supply initiatives (e.g., local groundwater conjunctive use programs) and established a buffer supply to mitigate against the risks associated with implementation of local and imported water supply programs. The 2004 IRP noted that future water supply reliability depends not only upon actions by MWD to secure reliable imported supplies, but also further development of local projects by local agencies.

MWD supported this conclusion by providing detailed updates for each of its resource categories, restating dry year IRP targets and examining current considerations, changed conditions, implementation strategies and identified programs, implementation challenges and cost information. A brief summary of each of MWD's water resource development categories (other than the Colorado River and SWP supplies, which were discussed in detail previously) is provided below:

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[16] *In April 2008, the Central Basin Municipal Water District filed a lawsuit to overturn the Water Supply Allocation Plan on the basis that it was unequitable and was not subject to environmental review. The litigation is pending. Despite this litigation, the MWD intends on implementing the plan in 2009.*

- *Conservation*: In 2006, MWD invested $10.6 million in conservation programs and initiatives, including executing a 10-year residential master conservation funding agreement with member agencies, encouraging the use of high-efficiency toilets, strengthening outdoor conservation programs and introducing new Industrial Process Improvement programs. In 2005-2006, MWD programs conserved approximately 762,000 AF, which was an increase of approximately 30,000 AF over the previous fiscal year. MWD's 2010 target for conservation savings is 865,000 AF.

- *Local Resources—Recycling, Groundwater Recovery and Seawater Desalination*: MWD has invested $213 million with its member agencies to develop local resource programs. MWD contributed approximately $24.5 million toward the production of 127,000 AF of local resource production supplies in 2006, which is an increase of 16,000 AF from 2005. MWD's 2010 target for regional water recycling and groundwater recovery is 410,000 AF. Further, three desalination project agreements have been signed.

- *Central Valley Storage and Transfer Programs*: MWD has developed significant water storage and transfer program partnerships in the Central Valley and has witnessed increased cooperation with DWR and federal agencies to facilitate water transfers. MWD continues to pursue transfers with Central Valley parties and has worked to improve existing storage programs with existing SWP storage partners. For 2008, MWD is currently seeking to acquire up to 250,000 AF by temporary transfer from the Central Valley.

- *In-Region Groundwater Storage*: The 2006 Implementation Report identified that components of MWD's in-region groundwater storage program may not meet its 2010 dry-yield target of 275,000 AF. As of October 2006, groundwater storage had been developed to provide about 135,000 AF. In response, MWD conducted a groundwater basin assessment to explore other groundwater storage opportunities. MWD's recent Groundwater Basin Assessment Study provided new information to focus on meeting this goal. MWD will continue to develop new strategies for groundwater storage.

MWD's 2006 Implementation Report demonstrates that the agency has continued to react aggressively to address challenges facing water resources. By amending existing strategies, MWD has made significant progress in most resource areas toward meeting the IRP targets. For example, in fiscal year 2006-2007, MWD saved approximately 812,000 AF through conservation efforts and is expected to meet its 2010 target. Local resource production is expected to exceed the 2010 target of 426,000 AF based on current production and expansion of existing programs. Existing supplies in Central Valley storage programs are also expected to exceed the 2010 target of 300,000 AF. While in-region groundwater storage programs are currently falling short of MWD's 2010 IRP target, MWD

is actively working to find new ways to meet this goal and the success of other programs, such as Central Valley storage, can avoid any negative impacts from failure to meet this single goal. For example, MWD has already exceeded its 2010 goal for dry year surface water storage. While SWP supplies are not projected to meet the 2010 IRP target or longer-term targets, MWD is actively seeking to resolve the risks associated with that supply, as discussed above.

MWD is currently updating the 2004 IRP.[17] The updated IRP will address existing and new challenges such as the continued drought conditions as well as Delta smelt litigation and climate change. As can be seen by these ongoing studies, MWD is continually updating its plans to meet ever-changing challenges to its water supplies.

(2) Local

(a) Los Angeles Municipal Code

The City of Los Angeles (the City) has adopted several ordinances in the LAMC in an effort to reduce water consumption. Specifically, the City of Los Angeles Ordinance No. 172,075, adopted in 1998, (Chapter XII, Article II, of the LAMC) requires all building owners to install low-flow showerheads (with a maximum flow of 2.5 gpm), water closets (with a maximum flow of 3.5 gpm), and low flow urinals (with a maximum 1.5 gallons per flush) prior to obtaining building permits. City Ordinance No. 163,532 (Chapter XII, Article IV, of the LAMC) also requires a 10 percent reduction in irrigation for large turf areas (three acres of turf or greater).

Additionally, the City has recently begun enforcement of prohibited water uses as defined in the City's Emergency Water Conservation Plan Ordinance (Chapter XIII, Article I, of the LAMC). When the City's Emergency Water Conservation Plan Ordinance is in effect, LADWP customers cannot:

- Use water on hard surfaces (e.g., sidewalks, walkways, driveways, or parking areas);
- Water lawns between 10:00 A.M. and 5:00 P.M., April 1 to September 30, and between 11:00 A.M. and 3:00 P.M., October 1 to March 31;
- Allow excess water from sprinklers to flood gutters;

[17] *Metropolitan Water District, Integrated Resources Plan, http://www.mwdh2o.com/mwdh2o/pages/yourwater/irp/; accessed October 20, 2008.*

- Use water to clean, fill, or maintain decorate fountains unless the water is part of a recycling system;
- Serve water to customers in eating establishments, unless requested; and
- Allow leaks to go unattended.

In addition to the above, additional restrictions instituted in the City's Emergency Water Conservation Plan Ordinance were recently adopted in August 2008 and include:

- Limiting watering times are limited to before 9 A.M. and after 4 P.M. and to 15 minutes per station for rotating sprinklers and 10 minutes per station for other types of sprinklers 12 months a year;
- Prohibiting landscape watering during rain;
- Prohibiting washing/rinsing vehicles with a hose when the hose does not have a functioning self-closing nozzle attached or allowing the hose to run continuously;
- Requiring hotels and motels to offer guests the option of reusing linen and towels;
- Limiting watering days to Monday, Thursday, and Saturday.
- Limiting watering days to Monday and Thursday only.
- Failure to comply with the above requirements would result in penalties per violation.

(b) LADWP's Securing L.A.'s Water Supply

The City of Los Angeles is faced with various ongoing challenges in securing its future water supplies due to among other things droughts, environmental restrictions, and climate change. In response to these uncertainties, the Mayor and LADWP prepared and released a Water Supply Action Plan entitled "Securing L.A.'s Water Supply" dated May 2008. The plan serves as a blueprint for creating sustainable sources of water for the City of Los Angeles to reduce dependence on imported supplies. This plan incorporates an aggressive multi-pronged approach that includes: investments in state-of-the-art technology; a combination of rebates and incentives; the installation of smart sprinklers, efficient washers and urinals; and long-term measures such as expansion of water recycling and investment in cleaning up the local groundwater supply. The plan outlines short-term conservation strategies as well as long-term conservation and recycling measures. Short-term conservation strategies include enforcing prohibited uses of water, expanding the prohibited uses of water, extending outreach efforts, and encouraging

regional conservation measures. Long-term conservation and recycling measures include increasing water conservation through reduction of outdoor water use and technology, maximizing water recycling, enhancing stormwater capture, accelerating clean-up of the groundwater basin, and expanding groundwater storage.

(c) LADWP 2005 Urban Water Management Plan

In accordance with the California Urban Water Management Planning Act, the LADWP has prepared the 2005 UWMP. The UWMP details the LADWP's efforts to promote the efficient use and management of its water resources. LADWP's UWMP used a service area-wide method in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the growth in water use for the entire service area was considered in developing long-term water projections for the City of Los Angeles through the year 2030.

In the next UWMP update (available in 2010), the LADWP will develop a revised demand forecast that will factor in the water demand for which all water supply assessments have been prepared in addition to future demands. This will also allow LADWP to work collaboratively with its supplemental water supplier, MWD, to ensure the City's anticipated water demands are incorporated into MWD's long-term water resources development plan.

3. Project Impacts

a. Methodology

Pursuant to SB 610, LADWP conducted a water supply assessment for the project as requested by the City of Los Angeles Department of City Planning. This water supply assessment is provided in Appendix J of this Draft EIR. The water demand for the proposed uses was derived from the Sewer Generation Rates table, developed by the City of Los Angeles Department of Public Works, Bureau of Sanitation (2002). LADWP independently calculated the anticipated water demands of the project using the project information provided. The analysis considers whether sufficient water supplies would exist in addition to the existing and planned future demands on LADWP during a single dry year, multiple dry years, and a maximum day demand.

b. Significance Thresholds

The following factors are set forth in the *City of L.A. CEQA Thresholds Guide (2006)* for consideration on a case-by-case basis in making determinations of significance:

- The total estimated water demand for the project;

- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into consideration the anticipated conditions at project build-out;
- The amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of project completion; and
- The degree to which scheduled water infrastructure or project design features would reduce or offset service impacts.

Based on these factors, a project would have a significant water impact if:

- The City's water supplies and water distribution capacity would be inadequate to serve the proposed use after appropriate infrastructural improvements have been installed.

c. Project Design Features

The project would be designed and built to achieve certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program at the "Silver" level through the incorporation of green building techniques and other sustainability features. Under this LEED® certification level, the project would be committed to achieving at minimum a 20 percent water use reduction. Water conservation measures that would be implemented to minimize water consumption would include bathroom and kitchen faucet aerators, high-efficiency clothes washers and dishwashers at a 6.0 water efficiency factor, high-efficiency toilets and urinals for office, hotel, and retail/restaurant uses, rotating sprinkler nozzles for landscape irrigation, and weather sensitive landscape timers.

d. Analysis of Project Impacts

(1) Construction

(a) Water Demand and Distribution

A short-term demand for water may occur during demolition, excavation, grading, and construction activities on-site. These activities would occur incrementally through time (from the start of construction to project build-out) and would be temporary in nature. The demand for water would be for soil watering (i.e., fugitive dust control), clean up, masonry, painting, and other short-term related activities. Furthermore, the water demand generated by project construction activities would be offset by the reduction in water consumption resulting from the demolition of existing uses. Overall, demolition and construction

activities would require minimal water demand and would not be expected to have any adverse impact on available water supplies or the existing water distribution system. Therefore, impacts associated with construction activities would be less than significant.

(2) Operation

(a) Water Demand

New development on the project site would result in an increase in long-term water demand for operational uses, maintenance, and other activities on the project site. According to the Water Supply Assessment, the projected water demand for the project is estimated at approximately 188,656 gpd or 210 AF annually. As discussed above, LADWP provided water service to existing uses located on the site, which required approximately 29,191 gpd or 33 AF per year as shown in Table IV.J-4 on page IV.J-13. Furthermore, the project would incorporate water conservation features which would further reduce the project's water demand by 22,974 gpd or 24 AF per year. Thus, when taking these existing uses and conservation features into account, the project would result in a net water demand of approximately 136,501 gpd or 153 AF per year. Table IV.J-5 on page IV.J-27 presents a breakdown of the existing and proposed land uses, and the corresponding water demand estimates.

LADWP's 2005 UWMP projects yearly water demand to reach 776,000 AF by 2030, or have an increase of 17 percent from 2005. Thus, the anticipated increase water usage of 153 AF annually would be within the available and projected water supplies for normal, single dry, and multiple dry years through the year 2030 water demand projections of LADWP's 2005 UWMP. LADWP concludes that it would be able to meet the water demand of the project as well as existing and planned future water demands of its service area.

In 2008, approximately 66 percent of the total water supplies for LADWP consisted of purchased water from the MWD. As noted above in its Blueprint Report and Regional UWMP, MWD found that it could meet 100 percent of the imported water demands within its service area in normal, single dry, and multiple dry years. However, as recommended in the Biological Opinion, MDW water exports from the SWP may be curtailed depending on flow conditions in the Delta.

Additionally, changes in hydrological conditions due to climate change could also have an impact on MWD's water supplies. In the recent State Water Project Delivery Reliability Report 2007, DWR described and analyzed the reliability of SWP supplies in the Delta through 2027 based on four climate change scenarios and two Delta target flow scenarios to account for the potential flow restrictions that could be imposed as a result of

Table IV.J-5
Estimated Water Demands for Existing and Proposed Land Uses

Land Use	Quantity [a]	Water Use Factor [b] (gpd/units)	Water Use (gpd)	Acre-Feet Per Year (AFY)
Existing				
Office/Studio	139,312[18]	0.15	20,897	23
Parking	121,670	0.02	2,433	3
Outdoor Water Use [c]			5,851	7
		Subtotal	**29,181**	**33**
Proposed Total				
Residential: 1 Bedroom	185 du	120	22,200	25
Residential: 2 Bedroom	186 du	160	29,760	33
Residential: 3 Bedroom	29 du	200	5,800	6
Hotel	125 rooms	130	16,250	18
Office	380,000	0.15	57,000	64
Retail [d,e]	10,300	0.08	824	1
Restaurant/Bar [d,e]	31,000	0.30	9,300	10
Parking	689,000	0.02	13,780	15
Outdoor Water Use [c]			33,742	38
		Subtotal	**188,656**	**210**
		Less Existing Uses	***(29,181)***	***(33)***
		Less Additional Conservation [e, f]	***(22,974)***	***(24)***
		Net Increase of Water Usage	**136,501**	**153**

[a] *Units are in square feet (sf) unless otherwise noted.*
[b] *Based on Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table dated 3/20/2002. Uses not listed are estimated by the closest type of use available in the table.*
[c] *Estimated to be 28 percent of indoor usage for commercial use, 18% for multi-family residential uses.*
[d] *The project would include a mix of retail and restaurant/bar uses that would total 41,300 square feet. A maximum of 31,000 square feet could be restaurant/bar uses. Therefore, since wastewater generation factors are higher for restaurants/bar than for retail uses, it was assumed that the maximum development of restaurant/bar uses would occur.*
[e] *Since completion of the Water Supply Assessment by LADWP, the retail and restaurant components of the project were slightly modified. However, to maintain the same net increase of water usage as specified in the Water Supply Assessment, additional water conservation measures would be incorporated into the project.*
[f] *Water Conservation due to additional conservation commitments recommended by LADWP. Preliminary estimates: assume 5.5 flushes per person per day, one dishwasher load per unit per day, and one load of clothes washed per unit every two days for residential. For retail, assume one toilet, one urinal, and one faucet per 1,000 square feet. As stated in Footnote e, the project would incorporate additional water conservation measures to maintain the net increase of water usage specified in the Water Supply Assessment.*

Source: Water Supply Assessment for the Columbia Square Project, Los Angeles, Department of Water and Power, Water Resources Division, January 17, 2008 (see Appendix J of this Draft EIR), Matrix Environmental, 2009.

the federal Delta smelt case.[19] As shown in Table IV.J-6 on page IV.J-29, based on the hydrological models, average SWP Table A deliveries from the Delta could be decreased to 66 to 69 percent of the maximum delivery amount of 4.133 million AF. The minimum annual delivery (during a single dry year) would range from 6 to 7 percent of the maximum amount.

Restoring the Delta's water capacity is a high priority for MWD, the Governor, and the California Legislature. Extensive plans are already underway for improving the operation of the Delta's water pumps while also protecting the Delta smelt and other endangered fish species. In June 2007, MWD's Board of Directors adopted an Action Plan to implement immediate short- term actions to stabilize the Delta and mid-term and long-term actions to find an ultimate solution to the Delta's sustainability. The Governor has made the Delta and statewide water policy a high priority by establishing the Delta Vision Process and the Bay-Delta Conservation Plan, and the California Legislature is using SB 27 to find a long-term water supply solution for the Delta.

Along with MWD's water management and reliability initiatives, LADWP is committed to providing a reliable water supply for the City as provided in its plan *"Securing L.A.'s Water Supply".* LADWP is planning to achieve this goal by expanding its water conservation efforts through public education, installing high efficient water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge.

In addition, compliance with State laws regarding water conservation measures, including pertinent provisions of Title 20 of the CCR, as well as City of Los Angeles Ordinance Nos. 172,075 and 163,532, would reduce water consumption estimates for the project at full build-out, thereby reducing the demand on City supplies. Thus, potential impacts associated with water supply would be less than significant. In addition, mitigation

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[18] *Includes 3,079 of office uses which existed at the time of the Notice of Preparation. Since then, however, these buildings have been demolished.*

[19] *The four climate change scenarios are defined by the climate change model used and the assumed greenhouse gas emissions scenario. The climate change models used are the Geophysical Fluid Dynamic Lab Model (GFDL) and the Parallel Climate model (PCM). The emissions scenarios are referred to as A2 and B1. A2 assumes high growth in population, regional based economic growth, and slow technological changes, which results in significantly higher greenhouse gas emissions. B1 represents low growth in population, global based economic growth, and sustainable development that results in a low increase in greenhouse gas emissions. Thus, the four scenarios are (A2 emissions with GFDL model; B1 emissions with GFDL model; A2 emissions with the PCM model; B1 emissions with the PCM model).*

Table IV.J-6
State Water Project Table A Delivery from the Delta Under Future 2027 Conditions

	Average Delivery		Maximum Delivery		Minimum Delivery	
Future Conditions [b]	**Thousand AF per year**	**% of maximum SWP Table A Delivery [a]**	**Thousand AF per year**	**% of maximum SWP Table A Delivery [a]**	**Thousand AF per year**	**% of maximum SWP Table A Delivery [a]**
Future 2027	2724-2850	66 – 69%	4133	100%	255-293	6 – 7 %

[a] *4.133 million AF per year. There are 29 water contractors, inclusive of MWD, who have signed long term contracts with the DWR for a total of 4.173 million acre feet per year. Of the 29 contractors, 26 receive their deliveries from the Delta with a maximum SWP Table A amount of 4.133 million acre feet per year.*

[b] *Range in values reflects four modified scenarios of climate change.*

Source: Department of Water Resources, The State Water Project Delivery Reliability Report 2007, August 2008.

measures have been included to ensure that water conservation efforts will be implemented in accordance with the requirements of LADWP.

(b) Water Infrastructure

The water infrastructure serving the project site consists of water mains located in the City streets surrounding the project site including a 10-inch water main in Sunset Boulevard and 8-inch water mains in Gower Avenue, Selma Avenue, and El Centro Avenue. Fire flow requirements typically dictate whether an existing water infrastructure system is adequate, as fire flow demands are higher than domestic water demands. As discussed in Section IV.H.1, Public Services – Fire Protection, of this Draft EIR, based on the adequate residual pressures of the existing water mains for domestic and fire flows, the existing water infrastructure would be adequate to meet the project's fire flow requirements. Please see Section IV.H.1, Public Services – Fire Protection, of this Draft EIR, for further discussion.

(3) Consistency with Regulatory Framework

(a) Senate Bill 610 and Senate Bill 221

The project meets the requirements of SB 610 which requires the urban water supplier to prepare a water supply assessment determining whether the projected water demand associated with the project is included as part of the most recently adopted UWMP. The proposed project is consistent with SB 610 as confirmed by LADWP, the water supplier for the City of Los Angeles, in its Water Supply Assessment dated January 17, 2008 for the project. As previously discussed above, the project would not be subject to the requirements of SB 221 as the project does not include 500 residential units

or more and the project site is within an urbanized area and has been previously developed for urban uses.

(b) California Urban Water Management Plan Act

The LADWP is consistent with the California Urban Water Management Plan Act as the LADWP Urban Water Management Plan is updated every five years. The next update will be available in 2010.

(c) California Code of Regulations

The project would meet or exceed the water efficiency requirements set forth by Title 20 of the CCR through the incorporation of water conservation features that would include bathroom and kitchen faucet aerators, high-efficiency clothes washers and dishwashers at a 6.0 water efficiency factor, high-efficiency toilets and urinals for office, hotel, and retail/restaurant uses, rotating sprinkler nozzles for landscape irrigation, and weather sensitive landscape timers. In addition, the project would also consider LEED certification. As such, the project would be consistent with applicable regulations.

(d) City of Los Angeles Ordinance Nos. 172,075 and 163,532

The project would be consistent with Ordinance Nos. 172,075 and 163,532, as design features associated with the project would include water conservation features with established maximum flow rate standards for facilities and fixtures. As described above, the project would include water conservation measures such as faucet aerators, high-efficiency washers, toilets, and urinals, rotating sprinklers nozzles for landscape irrigation, and weather sensitive landscape timers. Additionally, the project would adhere to any water use prohibitions enforced at the time by the City under its Emergency Water Conservation Plan Ordinance.

(e) 2005 Urban Water Management Plan

As previously discussed, the projected water demand for the project would fall within the LADWP projected future water demands set forth in the 2005 UWMP. In addition, the UWMP indicates that water would be available to meet the water demand of the projected service area until 2030.

4. Cumulative Impacts

a. Water Supply

As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by LADWP accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area. The types of projects subject to the requirements of SB 610 tend to be larger projects (e.g., residential projects with at least 500 dwelling units, shopping centers employing more than 1,000 persons or having more than 500,000 square feet of floor space, commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space, etc.) that may or may not have been included within the growth projections of the UWMP. The water supply assessment for such projects, in conformance with the UWMP, evaluates the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed. In addition, as described above, SB 221 requires that for residential subdivisions with 500 units or more that are in non-urban areas, written verification from the service provider (e.g., DWP) be submitted indicating sufficient water supply is available to serve the proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are or will be available prior to completion of the project.

Section III, General Description of Environmental Setting, of this EIR identifies 94 related projects anticipated to be developed within the project vicinity. The estimated water demand of the related projects is shown in Table IV.J-7 on page IV.J-32. As shown in Table IV.J-7, the related projects would have an average daily water demand of approximately 3,760,932 gpd or 4,213 AF annually. The project in conjunction with the related projects would yield a total average daily water demand of approximately 3,949,588 gpd or 4,423 AF annually. As previously stated, the LADWP's 2005 UWMP has projected water demands to reach 776,000 AF annually by 2030 or have an increase of 17 percent from 2005. The project in conjunction with the related projects would have an estimated average daily water demand of approximately 4,423 AF annually, which would fall within the available and projected water demand of the LADWP's 2005 UWMP. Furthermore, as the UWMP plans and provides for water supplies to serve existing and projected needs, including those of future growth and development as may occur through related projects, and the requirements of SB 610 and SB 221 provide means to ensure that the water supply needs of notable development projects are carefully considered relative to LADWP's ability to adequately meet future needs.

Table IV.J-7
Cumulative Water Demand

Related Project No.	Related Project	Total Water Demand (GPD)
1	Mini-mart & liquor store	406
2	Shopping Center	1,906
3	Fast food restaurant w/drive thru & specialty retail	1,368
4	Hotel & specialty retail	14,822
5	Gas station w/mini-mart	1,024
6	Cocktail lounge	2,738
7	Sunset Legacy Lofts	44,508
8	Private School	4,915
9	Apartments & retail	14,382
10	Park La Brea Apt Addition	70,800
11	Mixed-Use	70,374
12	Mixed-Use	61,750
13	Fairfax Av Mixed-Use	23,572
14	Apartments	25,960
15	Apartments & retail	16,250
16	Apartments	30,680
17	Condos & retail	17,397
18	Apartments	21,476
19	Condos	12,744
20	Apartments	70,800
21	Condos	51,448
22	Private elementary school expansion	1,024
23	Office	3,393
24	Mixed-Use	43,883
25	Quality Restaurant & Jazz Club	2,427
26	Hollywood/Garfield Mixed Use	26,506
27	Condos	51,448
28	Mixed-Use	10,606
29	Rite-Aid w/ drive-thru	1,638
30	LAUSD - Cen Reg Mid School #5	9,124
31	Mixed-Use	15,560
32	Mixed-Use	90,027
33	Desmond's Tower Res. Dev.	41,300
34	Mixed-Use	19,642
35	Mixed-Use	0
36	Hollywood & Vine Mixed-Use	194,057
37	Mixed-use	141,829
38	Gas station	1,280
39	Runyon Canyon Park-Parking Lot	1
40	Office Building	23,040
41	BLVD 6200 (south) - mixed-use	244,207
42	Mixed-Use	78,357

Table IV.J-7 (Continued)
Cumulative Water Demand

Related Project No.	Related Project	Total Water Demand (GPD)
43	Mixed-use	3,836
44	Third Street Mixed-Use Project	14,708
45	KTLA office/studio expansion	226,749
46	Sunset & Gordon Mixed-use (Old Spaghetti Factory)	35,054
47	Sunset & Vine Mixed-Use	79,179
48	LA Holocaust Museum	2,150
49	Argyle Lofts	21,644
50	Restaurant	5,043
51	Apts & retail (1/2 of blk Yucca & Highland & McCadden)	64,590
52	La Brea Urban Lofts	31,703
53	Restaurant & office	5,837
54	Restaurant (w/ gourmet shop)	5,821
55	Rest. & multi-purpose entertainment venue	4,992
56	Condos & retail	22,999
57	HK Town Project (Mixed-Use)	53,225
58	Retail & office bldg	6,268
59	Mixed-use residential and retail	25,841
60	Residential Development	9,912
61	Temple Israel of Hollywood expansion	2,304
62	Mixed-use residential, retail and restaurant	190,680
63	Mixed-use residential and retail	36,271
64	Mixed-use	25,068
65	Mixed-use (68 assisted-living apts w/ ret. & comm. spcs)	21,340
66	Hotel	8,320
67	Office	46,080
68	Mixed-use residential and retail	89,800
69	Wilshire La Brea High Rise	81,834
70	Mixed-Use	8,154
71	Hollywood Passage (Mixed-use)	52,855
72	Wilcox Selma Office Condo	16,320
73	Quality restaurant	3,110
74	Almond Tree Village	98,336
75	Restaurant/Club	19,039
76	Selma & Vine Office Building	21,898
77	Mixed-Use Project	62,271
78	Hollywood Production Center	13,452
79	Pharmacy/Drug Store	1,371
80	Palladium Renovation	1,024
81	Madame Tussauds Wax Museum	11,072
82	Target - Sunset Shopping Center	22,793
83	Highland Center Mixed-Use Project	207,375
84	Lanewood Condos	10,148
85	Pantages Theatre Office	41,088

Table IV.J-7 (Continued)
Cumulative Water Demand

Related Project No.	Related Project	Total Water Demand (GPD)
86	Academy Museum of Motion Pictures	76,800
87	ASC Screening Room	1,382
88	Condominiums	22,656
89	Hospital Expansion	44,160
90	Metropolitan Hotel Site	7,680
91	Retail (CIM/EISEN project)	6,164
92	Broadstone Hollywood	30,680
93	Palladium	132,267
94	Capital Records Tower	168,920
	Related Projects Total	**3,760,932**
	Project Total	**188,656**
	CUMULATIVE TOTAL	**3,949,588**

Source: Matrix Environmental, 2009.

The above related projects as well as other future development in the City would cumulatively increase the demand for water. The City of Los Angeles is faced with various ongoing challenges in securing its future water supplies due to among other things droughts, environmental restrictions, and climate change. As discussed above, in response to these uncertainties, the Mayor and LADWP released a Water Supply Action Plan entitled "Securing L.A.'s Water Supply" dated May 2008. The plan will serve as a blueprint for creating sustainable sources of water for the City of Los Angeles to reduce dependence on imported supplies. The plan calls for the City to meet this future increased demand through water conservation and water recycling. LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high efficient water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge.

Compliance of the project and related projects with regulatory requirements that promote water conservation such as the LAMC, including the City's Green Building Ordinance, as well as AB 32 which is discussed in detail in Section IV.B, Air Quality, would also assist in assuring that adequate water supply is available on a cumulative basis.

It is therefore anticipated that LADWP would be able to supply the demands of the project and related projects through the foreseeable future. Therefore, the cumulative

impacts due to the water demand of the related projects in combination with the project would not be significant.

b. Water Infrastructure

Development of the project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. However, each related project would be subject to discretionary review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of the each project. Furthermore, LADWP, Los Angeles Department of Public Works, and the City of Los Angeles Fire Department would conduct ongoing evaluations to ensure facilities are adequate. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

c. Global Warming and Water Supply

As indicated above, there are complex physical, chemical, and atmospheric mechanisms involved in global climate change that make it difficult to predict what the effects of global climate change will be, particularly at a State or local level. Due to this unpredictability, the secondary affects that global climate change may have on water supplies for a given region is even more difficult to predict.[20] The science on global warming is still evolving and has not reached a point where it can be quantified and incorporated into delivery projections of the SWP. Furthermore, policy recommendations on how to incorporate potential changes to water supply due to climate change into water resource planning and management are still being developed. Therefore, consistent with studies prepared by DWR, it is considered premature to make an assessment of impacts under CEQA of how climate change will affect water availability for the project.

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[20] *The Los Angeles Superior Court recently issued a statement of decision (Case No. BS 084677) on August 15, 2007 which upheld a local agency's Return to a Writ of Mandate and Final Additional Analysis to an EIR for a local development project (California Oak Foundation v. City of Santa Clarita (2005) 133 Cal.App.4th and struck down certification of the EIR for the Gate King project because it did not address legal uncertainties surrounding a water transfer. Among other issues, the statement of decision dealt with the analysis of the potential impact of global warming on water supplies and concluded that it was proper that no quantification of the impact of climate change on the reliability of SWP water was prepared because DWR has indicated in its reports that quantification is premature. The statement of decision indicates that DWR, with the most expertise on water supply in California, has determined that the science on global warming has not reached a point where it can be quantified and incorporated into delivery projections of the SWP. Accordingly, the statement of decision also concludes that the City is in no better position to quantify the effects of global warming on the reliability of SWP water and that it is not required to do so under CEQA.*

5. Mitigation Measures

Based on the analysis above, the project would not result in significant impacts related to water supply. However, the following mitigation measures are recommended to ensure that the project would be compliant with the City's recommended water conservation measures:

Mitigation Measure J-1: For the commercial uses on the project site, the applicant shall (unless otherwise required) and to the satisfaction of the Department of Building and Safety):

- Install high-efficiency toilets (maximum 1.28 gallons per flush [gpf]), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gpf), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.

- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.

Mitigation Measure J-2: For the residential uses on the site, the applicant shall (Unless otherwise required) and to the satisfaction of the Department of Building and Safety:

- Install a demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwelling(s);

- Install no more than one showerhead per shower stall, having a flow rate of no greater than 2.0 gallons per minute;

- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations; and,

- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be

incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

Mitigation Measure J-3: In addition to the requirements of the Landscape Ordinance, the landscape plan for the project shall incorporate the following:

- Weather-based irrigation controller with rain shutoff;
- Matched precipitation (flow) rates for sprinkler heads;
- Drip/microspray/subsurface irrigation where appropriate;
- Minimum irrigation system distribution uniformity of 75 percent;
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials;
- Use of landscape contouring to minimize precipitation runoff; and
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for irrigated landscape areas totaling 5,000 square feet and greater, to the satisfaction of the Department of Building and Safety.

6. Level of Significance After Mitigation

No significant impacts to the City's water supply would occur as a result of the project. The mitigation measures above would further ensure that such impacts would remain less than significant.

IV. Environmental Impact Analysis

J.2 Utilities and Service Systems - Wastewater

1. Introduction

This section addresses the potential impacts of the project on existing wastewater infrastructure and treatment facilities and whether sufficient capacity is available to meet the project's estimated wastewater generation. The project's consistency with adopted goals and ordinances is also discussed. The following analysis is based in part on information obtained from the City of Los Angeles Department of Public Works (LADPW), which is contained in Appendix K of this EIR.

2. Environmental Setting

a. Regulatory Framework

(1) City of Los Angeles General Plan Framework

Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework identifies goals, objectives, and policies for utilities in the City including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

(2) City of Los Angeles Municipal Code

In 1990, City Ordinance No. 166,060 (also known as the Sewer Allocation Ordinance) was adopted, which established sewer permit allocation regulations for projects that discharge into Hyperion Treatment Plant located in Playa del Rey. The ordinance established an annual sewage allotment of 5 million gallons per day (mgd), of which 34.5 percent (1.725 mgd) is allocated for priority projects, 8 percent (400,000 gallons per day [gpd]) for public benefit projects, and 57.5 percent (2.875 mgd, with a monthly

allotment of at least 239,583 gpd) for non-priority projects (of which 65 percent of this allocation is for residential and 35 percent to non-residential projects).[21] Before the City's Department of Building and Safety formally accepts a set of plans and specifications for a project for plan check, LADPW must first determine if there is allotted sewer capacity available for such a project. LADPW will not make such a determination until the Department of Building and Safety has determined that the project's plans and specifications are acceptable for plan check. If LADPW determines that there is allotted sewer capacity available for the project, then the Department of Building and Safety will accept the plans and specifications for plan check upon the payment of plan check fees. If a project is eligible to receive an allocation as a non-priority project, and the monthly allotment has been used, then the project is placed on a waiting list for the next month's allotment. At the request of the project applicant, the Department of Building and Safety will accept the project's plans and specifications as acceptable for plan check even if the project has been placed on the waiting list and a sewer permit has not yet been obtained from LADPW, with the understanding that the project will not be able to connect to the City's wastewater system until capacity is available and a sewer permit issued.

City Ordinance No. 171,036, effective June 3, 1996, changed the rate structure for new and expanded development to be based upon the strength of the wastewater flow in addition to its volume. The determination of wastewater strength for each applicable project is based upon City guidelines for average wastewater concentrations of two parameters, biological oxygen demand (BOD) and suspended solids, for each type of land use.

b. Existing Conditions

(1) Wastewater Generation and Infrastructure

Wastewater in the City of Los Angeles is collected and conveyed via the Hyperion Treatment Conveyance System (described in further detail below), which is owned and operated by LADPW.

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[21] *Priority Projects are projects which meet certain criteria specified in Section 4 of the ordinance, such as a residential or commercial/industrial project located within both a Community Plan Area and a Master Environmental Impact Report Area with a jobs/housing ratio of 1.74 or more for residential or 1.10 or less for commercial/industrial, an emergency trauma center and/or non-profit hospital, an affordable rental housing project, and a single-family dwelling, to name a few. Public Benefit Projects are determined by the City Council as projects that will benefit the public health, safety or otherwise provide a public benefit. Non-Priority Projects are granted allocations in the order of their applications.*

The project site is currently developed with several office buildings/studios comprising 136,233 square feet and 121,670 square feet of parking lot. Recently, three structures comprising 3,079 square feet located in the northern portion of the site fronting Selma Avenue were demolished. These three buildings were utilized as offices at the time of the Notice of Preparation (NOP) for the Draft EIR.[22] Therefore, the wastewater generation of these uses is taken into account. Based on generation factors provided by LADPW, the uses that existed at the time of the NOP are estimated to generate on average approximately 23,330 gpd of wastewater with a peak flow of 39,661 gpd. According to LADPW records, there are several sewer mains located in the vicinity of the project site including a 6-inch and 8-inch sewer main along Selma Avenue, an 8-inch and 10-inch sewer main along Gower Street, an 8-inch and 21-inch sewer main along Sunset Boulevard, and an 8-inch and 10-inch sewer main along El Centro Avenue. LADPW does not allow the flow within its sewer mains to exceed 50 percent capacity. Sewer lines exceeding 50 percent capacity are considered deficient. While the 50 percent design capacity for some of these sewer lines is known, the actual current flow level is not known except for the 10-inch in El Centro Avenue and the 21-inch in Sunset Boulevard. The 10-inch sewer main in El Centro Avenue has a 50 percent design capacity of 1.09 mgd and is approximately 30 percent full.[23] The 21-inch sewer main in Sunset Boulevard has a 50 percent design capacity of 4.14 mgd and is approximately 38 percent full. The 8-inch sewer mains in El Centro Avenue and Sunset Boulevard are at or near 50 percent capacity. It is unknown which sewer mains the existing buildings are connected to.

(2) Wastewater Treatment

All wastewater generated within the City of Los Angeles and LADPW's service area is transported through the Hyperion Treatment Conveyance System to one of four wastewater treatment plants owned and operated by LADPW: the Hyperion Treatment Plant (HTP) in Playa del Rey, Donald Tillman Water Reclamation Plant (TWRP) in Van Nuys, Los Angeles-Glendale Water Reclamation Plant (LAGWRP) in Los Angeles, or Terminal Island Treatment Plant (TTP) in Los Angeles. The Hyperion Treatment Conveyance System includes treatment plants, outfalls, and numerous sewer connections and major interceptors. The current treatment capacity of the entire Hyperion Treatment Conveyance System is approximately 550 mgd (consisting of 450 mgd at HTP, 80 mgd at

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[22] *At the time of the Notice of Preparation for the project, the project site included these three buildings which were utilized as offices. Since then, however, these buildings have been demolished. However, as CEQA Guidelines Section 15125 generally defines baseline conditions as those which existed at the time of the NOP, the office uses of these buildings are taken into account within this Draft EIR.*

[23] *City of Los Angeles Inter-departmental correspondence between City Planning and City Bureau of Sanitation regarding Columbia Square Notice of Preparation EIR, dated June 18, 2007.*

TWRP, and 20 mgd at LAGWRP).[24] The Hyperion Treatment Conveyance System has a current average dry water flow (ADWF) of approximately 410 mgd (consisting of 360 mgd at HTP, 38 mgd at TWRP, and 12 mgd at LAGWRP), leaving approximately 140 mgd of available treatment capacity.[25]

All wastewater generated within the City of Los Angeles is conveyed to and treated at HTP. HTP serves a total of 600 square miles in the City of Los Angeles and within other jurisdictions outside the City of Los Angeles. HTP is the City of Los Angeles' oldest and largest wastewater treatment facility and provides preliminary, primary, and secondary treatment processes, and also treats flows bypassed from the TWRP and LAGWRP. As stated above, HTP has an existing treatment capacity of 450 mgd and an ADWF of approximately 360 mgd, leaving approximately 90 mgd of treatment capacity available.[26]

Following the secondary treatment of wastewater, the majority of effluent from HTP is discharged into the Santa Monica Bay while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. HTP has two outfalls that presently discharge into the Santa Monica Bay (a one-mile outfall pipeline and five-mile outfall pipeline). Both outfalls are 12 feet in diameter. The one-mile outfall pipeline is 50 feet deep and is only used on an emergency basis. The five-mile outfall pipeline is 187 feet deep and is used to discharge secondary treated effluent on a daily basis. It was last inspected in November 2006.[27] Effluent to Santa Monica Bay from HTP has historically had effects on water quality. However, according to the City of Los Angeles Environmental Monitoring Division (EMD), since HTP's full secondary effluent discharge began in 1999 with a reduction in biosolids to Santa Monica Bay, water quality has improved with an increase in the number of species and the biodiversity in Santa

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[24] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan - Executive Summary, December 2006". Website: http://www.lacity.org/san/irp/, accessed August 2008.*

[25] *The approximate ADWF of 360 mgd for HTP was provided via telecommunication with Patricia Cruz, Environmental Engineer with the Bureau of Sanitation, October 25, 2007.*
California Regional Water Quality Control Board Los Angeles Region. "Fact Sheet: Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles (Donald C. Tillman Water Reclamation Plant)", September 27, 2006, revised November 30, 2006.
California Regional Water Quality Control Board Los Angeles Region. "Fact Sheet: Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit for the City of Los Angeles (Los Angeles Glendale Water Reclamation Plant)", September 28, 2006, revised November 27, 2006.

[26] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan- Summary Report, December 2006".*

[27] *City of Los Angeles Department of Public Works. "Hyperion Treatment Plant 5-Mile Outfall Inspection and Diversion to 1-Mile Outfall Fact Sheet, November 2006". Website: http://www.lasewers.org/treatment_plants/ hyperion/5-mile-outfall/hyperion_outfall_inspection_facts.pdf, accessed October 2007.*

Monica Bay. HTP effluent is required to meet the Regional Water Quality Control Board's (RWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's National Pollution Discharge Elimination System (NPDES) permit. Accordingly, HTP effluent to Santa Monica Bay is continually monitored by the EMD to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay.[28,29]

(a) Integrated Resources Plan

In November 2006, the City of Los Angeles Integrated Resources Plan (IRP), developed by the LADPW, and its corresponding Final EIR, were approved by the Los Angeles City Council.[30] The IRP was developed to incorporate greater efficiency for future, water, wastewater, and runoff management in the City and surrounding service areas. It is a multi-phase program that will result in the establishment of Citywide, regional, departmental and public and private partnerships. The IRP accounts for projected needs and sets forth improvements and upgrades to wastewater systems, recycled water systems, and runoff management programs in the City of Los Angeles through the year 2020. The IRP includes wastewater flow projections based on population projections from the Southern California Association of Governments (SCAG). As shown in Table IV.J-8 on page IV.J-43, the forecasted population for the Hyperion Treatment Conveyance System service area in 2010 is approximately 4,485,054 residents, approximately 4,641,928 residents in 2015, and approximately 4,854,483 residents in 2020. The wastewater flow projections account for planned levels of water conservation and assumed levels of collection system maintenance and rehabilitation. The ADWF in 2010 is estimated to be approximately 477.3 mgd, in 2015 approximately 492.3 mgd, and in 2020 approximately 511.5 mgd, with each amount falling well within the current system-wide treatment capacity of 550 mgd.

Despite the current and projected availability of system-wide treatment capacity, the IRP includes several proposals for improvements, additions, and expansions within the Hyperion Treatment Conveyance System to maintain adequate service over time. As HTP

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[28] *Most recent information per telecommunication with Frank Arambula of Hyperion Treatment Plant, October 11, 2007. However, an updated Santa Monica Bay Biennial Assessment Report by EMD is in progress.*

[29] *City of Los Angeles Department of Public Works, Bureau of Sanitation, Environmental Monitoring Division. "Santa Monica Bay Biennial Assessment Report: 2003-2004."*

[30] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan - Executive Summary," December 2006. Website: http://www.lacity.org/san/irp/, accessed August 2008.*

Table IV.J-8
Population and ADWF Projections for Hyperion Treatment Conveyance System Service Area

	2000	2005	2010	2015	2020
SCAG Population	4,138,567	4,331,109	4,485,054	4,641,928	4,854,483
ADWF (in mgd)	443.1	461.8	477.3	492.3	511.5

Source: City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan", December 2006.

is connected with the Hyperion Treatment Conveyance System and its components including, other treatment plants (TWRP and LAGWRP), connecting outfalls, and numerous sewer connections and major interceptors, current and future implementation of the IRP and its corresponding expansion projects will support continued availability of capacity at HTP. For example, improvements planned to increase wastewater storage capacity and treatment capacity at TWRP and LAGWRP would result in less bypass flows and a reduced level of treatment demand at HTP.[31] As part of the adopted IRP, proposed improvements include the following:[32]

- Expansion of HTP biosolids handling capacity (e.g., new digesters and truck loading facility);
- Addition of secondary clarifiers at HTP to meet existing treatment requirements;
- Expansion and upgrade of TWRP capacity to 100 mgd with advanced treatment;
- Addition of 60 million gallon wastewater storage at TWRP;[33]
- Construction of a five million gallon diurnal storage for wastewater and a five million gallon recycled water storage at LAGWRP, and maintain the option to upgrade LAGWRP to advance treatment;
- Construction of new Glendale Burbank Interceptor Sewer (GBIS);[34]

[31] *Further confirmation of statement per telecommunication with Patricia Cruz, Environmental Engineer, Bureau of Sanitation, October 25, 2007.*

[32] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan, Volume 5: Adaptive CIP," December 2006. Website: http://www.lacity.org/san/irp/, accessed August 2008.*

[33] *According to a recent concept study for the TWRP conducted by the Bureau of Sanitation, the Bureau of Sanitation is proposing a 21 mg rather than the 60 mg wastewater storage tank proposed in the IRP. Submittal to the City of Los Angeles for project recommendation is scheduled. Telecommunication with Patricia Cruz, Environmental Engineer, Bureau of Sanitation, October 25, 2007.*

- Construction of new North East Interceptor Sewer (NEIS) Phase 2; and
- Construction Valley Spring Lane Interceptor Sewer (VSLIS).

Implementation of the IRP would result in an increased treatment capacity in the Hyperion Treatment Conveyance System. The treatment capacity would increase by 20 mgd for a total of 570 mgd (TWRP would have a new capacity of 100 mgd, while HTP's capacity of 450 mgd and LAGWRP's capacity of 20 mgd would stay the same). Adoption of the IRP also includes the Adaptive Capital Improvement Program (CIP) which includes the anticipated capital, operation and maintenance, project timing, and implementation strategy for tracking and monitoring triggers. As discussed in the IRP and CIP and based on LADPW information, projects have been completed within all the treatment plants and sewer lines and additional on-going improvements have been proposed in order to continually provide services and meet wastewater needs of the City of Los Angeles.[35] As stated in the IRP, many of these projects are "Go-Projects" and are considered for immediate implementation to protect the public health and environment.

With implementation of the IRP, LADPW and Bureau of Sanitation expects to provide ample wastewater treatment services to the City of Los Angeles and contracting cities through 2020. Furthermore, projections show that adequate wastewater treatment services are expected to be available through 2025.[36]

3. Project Impacts

a. Methodology

For the analysis of wastewater impacts associated with project operation, the wastewater generation of the project was estimated using wastewater generation factors provided by LADPW. The existing and proposed wastewater flows were then compared to assess the adequacy of the existing sewer system to accommodate the additional flows. Project buildout would occur in 2013. The IRP provides forecasted treatment capacity and ADWF in 5 year increments. Since no data regarding 2013 (project buildout year) is

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[34] *Recent legal events have delayed the GBIS development process. However, this delay is not anticipated to impact the future capacity ability of the Hyperion Treatment Conveyance System. Telecommunication with Patricia Cruz, Environmental Engineer, Bureau of Sanitation, October 25, 2007.*

[35] *Implementation of the wastewater projects can be further evaluated at "Wastewater Capital Improvement Program, July 2007". Website: http://www.lacitysan.org/fmd/WCIP/WCIPbook07-08.pdf.*

[36] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan - Executive Summary, December 2006". Website: http://www.lacity.org/san/irp/, accessed August 2008.*

available, the project's estimated wastewater generation and projected ADWF is compared with the available treatment capacity within the Hyperion Treatment Conveyance System for 2015 and 2020. The projected capacity and ADWF for the years 2015 and 2020 are based on information provided in the IRP and consistent with the IRP, ADWF is used to evaluate treatment plant capacity. Cumulative wastewater generation is also compared with the available capacity of the Hyperion Treatment Conveyance System using the ADWF.

b. Significance Thresholds

According to the *City of L.A. CEQA Thresholds Guide (2006*), a project would normally have a significant wastewater impact if:

- The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

c. Project Design Features

As discussed in Section IV.J.1, Water Supply, of this Draft EIR, the project would be designed to be certified under the LEED program at the Silver level. Under this LEED certification level, the project would be committed to achieving at minimum a 20 percent water use reduction. The project would implement water conservation measures that would minimize water consumption. Such measures would include bathroom and kitchen faucet aerators, high-efficiency clothes washers and dishwashers at a 6.0 water efficiency factor, high-efficiency toilets and urinals for office, hotel, and retail/restaurant uses, rotating sprinkler nozzles for landscape irrigation, and weather sensitive landscape timers. As such, the project's wastewater generation would also be reduced.

d. Analysis of Project Impacts

(1) Construction

During construction of the project, a negligible amount of wastewater would be generated by construction staff. It is anticipated that portable toilets would be provided by a private company and the waste disposed of off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater

flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements because construction wastewater generated would be negligible as discussed above. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

(2) Operation

(a) Wastewater Generation and Infrastructure

The project would develop the project site with approximately 400 residential units, a 125-room hotel, approximately 380,000 square feet of office space (including entertainment-related office space), 41,300 square feet of retail and restaurant/bar uses (including restaurant/bar use in the hotel), and 689,000 square feet of parking space. Wastewater generation for the project was estimated using LADPW wastewater generation factors. Of the project's 41,300 square feet of retail and restaurant/bar uses, a maximum of 31,000 square feet could be restaurant/bar uses. Therefore, since wastewater generation factors are higher for restaurant/bar uses than for retail uses, it was assumed that the maximum development of restaurant/bar uses (i.e., 31,000 square feet) would occur. As shown in Table IV.J-9 on page IV.J-47, the project is estimated to generate on average approximately 154,914 gpd (0.15 mgd) of wastewater with a peak flow of 263,354 gpd (0.26 mgd). As previously discussed, the existing office buildings/studios and parking lot are estimated to generate on average approximately 23,330 gpd with a peak flow of 39,661 gpd. Therefore, the project would result in a net increase of 131,584 gpd (0.13 mgd) of wastewater on an average day and 223,692 gpd (0.23 mgd) of wastewater on a peak day as shown in Table IV.J-9. Based on the Sewer Capacity Availability Request provided by (Bureau of Engineering, the 10-inch sewer main in El Centro Avenue has capacity to accommodate the project.[37,38] It is assumed that the entire project would connect to an on-site sewer manifold with a single outfall to the 10-inch main on El Centro Avenue. Additionally, it may be possible that the existing sewer connections serving the office buildings/studios on the project site could be retained to serve the renovated uses within the buildings to remain. Therefore, the impact of wastewater generation from the project to conveyance infrastructure would be less than significant.

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[37] *Los Angeles Department of Public Works, Sewer Capacity Availability Request for 6121 W. Sunset Boulevard, approved September 9, 2008.*

Table IV.J-9
Estimated Wastewater Generation for the Project

Land Use	Amount of Development	Generation Factor (in gpd)[a]	Average Wastewater Generation (in gpd)	Peak Wastewater Generation (in gpd)[b]
Project				
Residential: 1 bedroom	185 units	120 per unit	22,200	37,740
Residential: 2 bedrooms	186 units	160 per unit	29,760	50,592
Residential: 3 bedrooms	29 units	200 per unit	5,800	9,860
Hotel	125 rooms	130 per room	16,250	27,625
Office	380,000 sf	0.15 per sf	57,000	96,900
Retail [c]	10,300 sf	0.08 per sf	824	1,401
Restaurant/Bar[c]	31,000 sf	0.30 per sf	9,300	15,810
Parking	689,000 sf	0.02 per sf.	13,780	23,426
		Project Total	**154,914**	**263,354**
Existing				
Office/Studio	139,312 sq. ft.[d]	0.15 per sf	20,897	35,525
Parking	121,670 sq. ft.	0.02 per sf	2,433	4,137
		Existing Total	**23,330**	**39,661**
	Net New (Proposed – Existing)		**131,584**	**223,692**

[a] *Provided by the City of Los Angeles Department of Public Works.*
[b] *Estimated to be 1.7 times the average daily wastewater generation.*
[c] *The project would include a mix of retail and restaurant/bar uses that would total 41,300 square feet. A maximum of 31,000 square feet could be restaurant/bar uses. Therefore, since wastewater generation factors are higher for restaurants/bar than for retail uses, it was assumed that the maximum development of restaurant/bar uses would occur.*
[d] *At the time of the Notice of Preparation for the Draft EIR, the project site included these three buildings which were utilized as offices. Since then, however, these buildings have been demolished. CEQA Guidelines Section 15125 generally defines baseline conditions as those which existed at the time of the NOP and thus, wastewater generation associated with the office uses of these buildings are taken into account within this analysis.*

Source: Matrix Environmental, 2009.

(b) Wastewater Treatment

Wastewater generated by the project would ultimately be conveyed via the Hyperion Treatment Conveyance System to HTP. The ADWF for the Hyperion Treatment Conveyance System service area is projected to be approximately 477.3 mgd in 2010,

[38] *The Sewer Capacity Availability Request provides an approved capacity of 134,314 GPD. The project would generate a net flow of 131,584 GPD which is below this approved capacity.*

492.3 mgd in 2015, and 511.3 mgd in 2020. These forecasted increases in wastewater flows without the project are well within the current Hyperion Treatment Conveyance System treatment capacity of 550 mgd. According to these projections and based on existing capacity, the Hyperion Treatment Conveyance System would still have a capacity of 73 mgd (or 13 percent) in 2010, 58 mgd (or 10 percent) in 2015, and 39 mgd (or 7 percent) in 2020.

The project's wastewater generation would contribute an average wastewater flow of 154,914 gpd (0.15 mgd) and a peak flow of 263,354 gpd (0.26 mgd)., which could be easily accommodated within the projected available treatment capacity of the Hyperion Treatment Conveyance System for 2015 (58 mgd) and 2020 (39 mgd) without considering the 20 mgd increase in capacity to 570 mgd expected with implementation of the IRP improvements. Furthermore, the wastewater generation estimate does not account for reductions in wastewater that would occur with implementation of water conservation measures presented in Section IV.J.1, Water Supply, of this Draft EIR. Lastly, the project would be required to pay a connection fee through the Connection Fee Program which would ensure that all users pay a fair share for necessary expansions of the sewer system, additional improvements to conveyance, treatment, and disposal facilities. As such, the increase in wastewater flows generated by the project would have a less than significant impact on wastewater treatment facilities.

In addition, effluent conveyed to HTP would not have a significant affect on the Santa Monica Bay as HTP continually monitors all effluent, currently meets applicable water quality standards, and is required to comply with water quality standards established for beneficial uses.

(3) Consistency with Regulatory Framework

(a) City of Los Angeles General Plan Framework

As previously discussed, Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework identifies goals, objectives, and policies for utilities in the City including wastewater collection and treatment. In accordance with Goal 9A, the project would connect to the existing sewer system, which has been shown to have adequate capacity to meet the demands of the project. Therefore, the project would be consistent with the goals of the General Plan Framework.

(b) City of Los Angeles Municipal Code

To connect to the existing sewer system, the project would be subject to City Ordinance No. 166,060 requiring a determination by LADPW that there is allotted sewer capacity available for the project. As previously discussed, LADWP has determined that it

has sufficient capacity to accommodate the project. Therefore, the project would be in compliance with City Ordinance No. 166,060.

The project would also be subject to City Ordinance No. 171,036, requiring the payment of wastewater connection fees based upon the strength of the project's wastewater flow in addition to its volume. These fees would be paid prior to the project's connection to the City's sewer system. Therefore, the project would be in compliance with City Ordinance No. 171,036.

4. Cumulative Impacts

Section III, Environmental Setting, of this EIR identifies 94 related projects that are anticipated to be developed within the vicinity of the project site and that are within the service areas of the Hyperion Treatment Conveyance System and HTP. These related projects would cumulatively contribute, in conjunction with the project, to the wastewater generation in the project area. As shown in Table IV.J-10 on page IV.J-50, the estimated wastewater generation associated with related projects on average is approximately 3,112,123 gpd (3.12 mgd) with a peak flow of 5,290,609 gpd (5.29 mgd). The proposed project would contribute 154,914 gpd (0.15 mgd) with a peak flow of 263,354 gpd (0.26 mgd) to this estimated generation for a total of 3,267,037 gpd (3.26 mgd) with a peak flow of 5,553,963 gpd (5.5 mgd) as shown in Table IV.J-10.

As discussed above, the Hyperion Treatment Conveyance System has a current capacity of 550 mgd and a current ADWF of approximately 410 mgd. By 2015 and 2020, the ADWF of the Hyperion Treatment Conveyance System is projected to be 492.3 mgd and 511.3 mgd, respectively. For 2015 and 2020, the cumulative wastewater flows would increase the projected ADWF to 495.5 mgd, and 514.5 mgd, respectively. The ADWF projections in conjunction with the cumulative wastewater estimate from related projects represents a conservative analysis as the ADWF projections already take into account future population growth, including growth such as that represented by related projects.

As with the project, each related project proposing to connect to the City sewer system would be subject to City Ordinance No. 166,060 requiring a determination by LADPW that there is allotted sewer capacity available for the project. Furthermore, implementation of the IRP and completion of the "Go-Projects" including improvements throughout the Hyperion Treatment Conveyance System consisting of the expansion of the TWRP and improvements at HTP, LAGWRP, and the wastewater collection system, capacity of the Hyperion Treatment Conveyance System would be increased to 570 mgd. The IRP would increase the treatment capacity of TWRP and treatment process at LAGWRP, which would result in less bypass flows to HTP for processing. As such,

Table IV.J-10
Cumulative Wastewater Generation

Related Project No.	Project	Residential Generation	Rest/Bar Generation	Retail Generation	Office Generation	Hotel Generation	Other Generation	Hospital Generation	Schools Generation	Gas Station Generation
1	Mini-mart & liquor store			317						
2	Shopping Center			1,489						
3	Fast food restaurant w/drive thru & specialty retail		647	422						
4	Hotel & specialty retail			400		11,180				
5	Gas station w/mini-mart									800
6	Cocktail lounge		2,139							
7	Sunset Legacy Lofts	36,600		1,031						
8	Private School								3,840	
9	Apartments & retail	10,800		1,280						
10	Park La Brea Apt Addition	60,000								
11	Mixed-Use	57,600	1,200	680						
12	Mixed-Use	48,000		3,992						
13	Fairfax Av Mixed-Use	18,600		1,269						
14	Apartments	22,000								
15	Apartments & retail	12,600		1,080						
16	Apartments	26,000								
17	Condos & retail	14,000		685						
18	Apartments	18,200								
19	Condos	10,800								
20	Apartments	60,000								
21	Condos	43,600								
22	Private elementary school expansion								800	
23	Office				2,651					
24	Mixed-Use	36,000		1,096						
25	Quality Restaurant & Jazz Club		1,896							
26	Hollywood/Garfield Mixed Use	21,600		795						
27	Condos	43,600								
28	Mixed-Use	8,400		542						
29	Rite-Aid w/ drive-thru			1,280						
30	LAUSD - Cen Reg Mid School #5								7,128	
31	Mixed-Use	11,400	1,647							

Table IV.J-10 (Continued)
Cumulative Wastewater Generation

Related Project No.	Project	Residential Generation	Rest/Bar Generation	Retail Generation	Office Generation	Hotel Generation	Other Generation	Hospital Generation	Schools Generation	Gas Station Generation
32	Mixed-Use	75,600		640						
33	Desmond's Tower Res. Dev.	35,000								
34	Mixed-Use	16,000		595						
35	Mixed-Use									
36	Hollywood & Vine Mixed-Use	105,000	14,850	960		39,000				
37	Mixed-use	87,400		30,232						
38	Gas station									1,000
39	Runyon Canyon Park-Parking Lot									
40	Office Building				18,000					
41	BLVD 6200 (south) - mixed-use	190,400		15,262						
42	Mixed-Use	48,400	12,150	2,408	2,040					
43	Mixed-use	2,600		600						
44	Third Street Mixed-Use Project	12,000		428						
45	KTLA office/studio expansion				111,148		66,000			
46	Sunset & Gordon Mixed-use (Old Spaghetti Factory)	28,800		836						
47	Sunset & Vine Mixed-Use	61,200		5,440						
48	LA Holocaust Museum						1,680			
49	Argyle Lofts	14,600			3,450					
50	Restaurant		3,940							
51	Apts & retail (1/2 of blk Yucca & Highland & McCadden)	54,000		680						
52	La Brea Urban Lofts	23,600	900	2,112						
53	Restaurant & office		240		4,320					
54	Restaurant (w/ gourmet shop)		4548							
55	Rest. & multi-purpose entertainment venue		3,900							
56	Condos & retail	19,200		268						
57	HK Town Project (Mixed-Use)	37,400		7,104						
58	Retail & office bldg			2,392	2,505					
59	Mixed-use residential and retail	21,600		276						
60	Residential Development	8,400								

Table IV.J-10 (Continued)
Cumulative Wastewater Generation

Related Project No.	Project	Residential Generation	Rest/Bar Generation	Retail Generation	Office Generation	Hotel Generation	Other Generation	Hospital Generation	Schools Generation	Gas Station Generation
61	Temple Israel of Hollywood expansion						1,200		600	
62	Mixed-use residential, retail and restaurant	157,400	2,850	1,016						
63	Mixed-use residential and retail	30,200		496						
64	Mixed-use	19,000			2,069					
65	Mixed-use (68 assisted-living apts w/ ret. & comm. spcs)	13,600		4,134						
66	Hotel					6,500				
67	Office				36,000					
68	Mixed-use residential and retail	74,800		1,200						
69	Wilshire La Brea High Rise	66,400		2,720						
70	Mixed-Use	6,400		470						
71	Hollywood Passage (Mixed-use)	43,200		1,468						
72	Wilcox Selma Office Condo				12,750					
73	Quality restaurant		2,430							
74	Almond Tree Village	81,600		1,600						
75	Restaurant/Club		1,874			13,000				
76	Selma & Vine Office Building		1,761		15,347					
77	Mixed-Use Project	43,800		6,091	2,180					
78	Hollywood Production Center	11,400								
79	Pharmacy/Drug Store			1,071						
80	Palladium Renovation			800						
81	Madame Tussauds Wax Museum			112			8,538			
82	Target - Sunset Shopping Center			17,807						
83	Highland Center Mixed-Use Project	99,200		3,632	27,930	39,000				
84	Lanewood Condos	8,600								
85	Pantages Theatre Office				32,100					
86	Academy Museum of Motion Pictures						60,000			
87	ASC Screening Room						1,080			
88	Condominiums	19,200								
89	Hospital expansion							34,500		
90	Metropolitan Hotel Site				6,000					

Table IV.J-10 (Continued)
Cumulative Wastewater Generation

Related Project No.	Project	Residential Generation	Rest/Bar Generation	Retail Generation	Office Generation	Hotel Generation	Other Generation	Hospital Generation	Schools Generation	Gas Station Generation
91	Retail (CIM/EISEN project)			4,816						
92	Broadstone Hollywood	26,000								
93	Palladium	34,000	3,810		35,550	32,630				
94	Capital Records Tower	90,000		8,000	15,000	26,000				
Total Related Project		**2,225,800 GPD**	**60,782 GPD**	**142,024 GPD**	**329,040 GPD**	**167,310 GPD**	**138,498 GPD**	**34,500 GPD**	**12,368 GPD**	**1,800 GPD**

	Average	Peak
Total Related Project – Wastewater Generation	**3,112,123**	**5,290,609**
Project Wastewater Generation	**154,914**	**2,633,538**
TOTAL CUMULATIVE WASTEWATER GENERATION	**3,267,037**	**5,553,963**

	2010	2015
Hyperion Treatment Conveyance System ADWF	**492,300,000**	**511,300,000**
Cumulative Wastewater Generation	**3,267,037**	**3,267,037**
	495,567,037	**514,567,037**

Source: Matrix Environmental, 2009.

LADPW anticipates ample wastewater treatment services to the City of Los Angeles and contracting cities through 2020.[39] Therefore cumulative impacts associated with wastewater treatment would be less than significant.

HTP currently meets applicable water quality standards as set forth by the NPDES. As such, the cumulative wastewater effluent discharged to the Santa Monica Bay would have a less than significant impact on water quality. Implementation of the IRP, upgrades in the advanced treatment processes at HTP, and continual monitoring by the EMD would ensure that effluent discharged into Santa Monica Bay would be within applicable limits. Thus, cumulative impacts on Santa Monica Bay water quality would be less than significant and the project's contribution to the impact would not be cumulatively considerable.

5. Mitigation Measures

Potential impacts related to wastewater due to construction and operation of the project would be less than significant. Therefore, no mitigation measures are required.

6. Level of Significance After Mitigation

The project would result in less than significant impacts with regard to wastewater.

[39] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan - Executive Summary, December 2006". Website: http://www.lacity.org/san/irp/, accessed August 2008.*

IV. Environmental Impact Analysis

J.3 Utilities and Service Systems Solid Waste

1. Introduction

This section analyzes potential project impacts on existing solid waste facilities and service systems as well as project consistency with solid waste regulations. The analysis estimates the amount of solid waste that would be generated by the project and evaluates whether existing solid waste collection and disposal facilities could accommodate project-generated waste.

2. Environmental Setting

a. Regulatory Framework

(1) State Regulations

Recognizing the need to address declining landfill capacity, the State of California has enacted three key legislations relating to solid waste: Assembly Bill 939 – the California Integrated Waste Management Act of 1989 (Public Resources Code Sections 41000-41460); Senate Bill 1327 – the California Solid Waste Reuse and the Recycling Access Act of 1991 (Public Resources Code Sections 42900-42911); and Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements. Each of these regulations is described below.

(a) Assembly Bill 939 – California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (AB 939) was passed by the State legislature for the purpose of establishing an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 requires that all counties and cities develop a comprehensive solid waste management program that includes a Source Reduction and Recycling Element (SRRE) which would include policies for but not limited to: waste characterization, source reduction, recycling, composting, solid waste facility capacity, education and public information, funding, special waste (asbestos, sewage sludge, etc.), and household hazardous waste. Additionally, all

counties must develop a Siting Element to address the need for landfill/transformation facilities for the next 15 years. In accordance with AB 939, all cities and counties must prepare and submit to the California Integrated Waste Management Board (CIWMB) an annual report which summarizes the jurisdictions' progress in reducing solid waste. AB 939 also mandated that all cities and counties divert 25 percent of their waste stream by 1995, and 50 percent by 2000 through source reduction, recycling, and reuse programs.

(b) Senate Bill 1327 – California Solid Waste Reuse and the Recycling Access Act of 1991

The California Solid Waste Reuse and the Recycling Access Act of 1991 (Public Resources Code Sections 42900-42911), as amended, requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, or institutional building, marina, or residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The size of these storage areas are to be determined by the appropriate jurisdictions' ordinance. If no such ordinance exists with the jurisdiction, the CIWMB model ordinance shall take effect.

(c) Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements

Passed in 2002, the Construction and Demolition Waste Materials Diversion Requirements require that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition (C&D) waste. The legislation also requires that the CIWMB adopt a model ordinance for diverting 50-75 percent of all C&D waste from landfills.

(2) Regional Plans

(a) Los Angeles County Integrated Waste Management Plan

The Los Angeles County Integrated Waste Management Plan (CoIWMP), approved by the CIWMB on June 23, 1999, is a set of planning documents that sets forth a regional approach for the management of solid waste through source reduction, recycling and composting, and environmentally safe transformation and disposal. The CoIWMP recognizes that landfills will remain an integral part of the County's solid waste management system in the foreseeable future and assures that the waste management practices of cities and other jurisdictions in the County are consistent with the solid waste diversion goals of AB 939.

The CoIWMP includes the Countywide Integrated Waste Management Summary Plan (Summary Plan), which was approved by the CIWMB on June 23, 1999. Pursuant to AB 939, the Summary Plan describes the actions to be taken to achieve the mandated

waste diversion goals of AB 939. The Summary Plan establishes countywide goals and objectives for integrated waste management; establishes an administrative structure for preparing and managing the Summary Plan; describe the countywide system of governmental solid waste management infrastructure; describes the current system of solid waste management in County and the cities; summarize the types of solid waste programs; and describe programs that could be consolidated or coordinated countywide; and analyzes how these countywide programs are to be financed. The County is currently in the process of updating the Summary Plan to include new revised goals and policies, including policies to promote conversion technologies and the development of facilities to export waste to out-of-County landfills, provide an update on Countywide programs to better assist jurisdictions, and reflect changes in the Countywide solid waste management system.[40] The update of the Summary Plan is anticipated to be complete in 2010.

Also a part of the CoIWMP and pursuant to AB 939, the County prepared the Countywide Siting Element (Siting Element) which identifies goals, policies, and strategies that provide for the proper planning and siting of solid waste disposal and transformation facilities for the next 15 years. The Siting Element was approved by the CIWMB on June 24, 1998 and provides strategies and establishes siting criteria for evaluating the development of needed disposal and transformation facilities. The County is also currently in the process of updating the Siting Element to reflect the most recent information regarding remaining landfill disposal capacity and the County's current strategy for maintaining adequate disposal capacity. As with the Summary Plan, the update of the Siting Element is anticipated to be complete in 2010.

(3) City of Los Angeles Plans and Regulations

(a) City of Los Angeles Solid Waste Management Policy Plan

The City of Los Angeles Solid Waste Management Policy Plan (CiSWMPP), adopted in 1993, is the City's long-range policy plan that provides direction for the solid waste management hierarchy and integrates all facets of solid waste management planning. The objective of the CiSWMPP is to promote source reduction or recycle a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter, and 70 percent of the waste by 2020.[41] The CiSWMPP calls for the disposal of the remaining waste in local and possibly remote landfills. Further, the CiSWMPP contains a SRRE, which includes goals and objectives for achieving AB 939 waste diversion rates and identifies programs for source reduction, recycling, and composting. The following five goals of the CiSWMPP

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[40] *Los Angeles County Integrated Waste Management Plan 2006 Annual Report.*

[41] *City of Los Angeles Department of Public Works Bureau of Sanitation, City of Los Angeles Solid Waste Planning Background Studies Summary Report, http://www.lacity.org/san/solid_resources/pdfs/rfp-swirp-appendix-b3.pdf, accessed January 16, 2007.*

reflect the importance of source reduction and materials recovery to the success of the plan:

- Maximum Waste Diversion: Create an integrated solid waste management system that maximizes source reduction and materials recovery and minimizes waste requiring disposal.

- Adequate Recycling Facility Development: Expand the number of facilities that enhance waste reduction, recycling, and composting throughout the City in ways that are economically, socially, and politically acceptable.

- Adequate Collection, Transfer, and Disposal of Mixed Solid Waste: Ensure that all mixed solid waste that cannot be reduced, recycled, or composted is collected, transferred, and disposed in a manner that minimizes adverse environmental impacts.

- An Environmentally Sound Waste Management Operation: Develop an environmentally sound solid waste management system that protects public health and safety, protects natural resources, and utilizes the best available technology to accommodate the needs of the City.

- A Cost Effective Waste Management Operation: Operate a cost-effective integrated waste management system that emphasizes source reduction, recycling, reuse, and market development and is adequately financed to meet operational and maintenance needs.

The City of Los Angeles is currently in the process of developing the Solid Waste Integrated Resources Plan (SWIRP), a 20-year master plan to reduce solid waste, increase recycling, and manage trash in the City. The SWIRP would supercede the existing CiSWPPP. The SWIRP is intended to provide an outline of the policies, programs, infrastructure, regulations , incentives, new green jobs[42], technology, and financial strategies necessary to achieve the City's goal of becoming a "zero waste" city by the year 2030. The term "zero waste" refers to maximizing recycling, minimizing waste, reducing consumption, and encouraging the use of products with recycle/reused materials. As noted by the City, zero waste is a goal and not a categorical imperative – the City is seeking to come as close to "zero waste" as possible. Preparation of the SWIRP is expected to be completed sometime in 2013.[43]

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[42] *"Green jobs" is the term for work force opportunities created by companies and organizations whose mission is to improve environmental quality.*

[43] *Personal telephone communication with Allen Wang, City of Los Angeles, Department of Public Works, June 3, 2008.*

(b) City of Los Angeles General Plan Framework

As discussed and detailed in Section IV.E, Land Use, of this EIR, the City of Los Angeles General Plan Framework (Framework) provides a Citywide strategy for long-term growth planning. The Framework includes an Infrastructure and Public Services Chapter, which responds to State and Federal mandates to plan for adequate infrastructure in the future. The Framework addresses many of the programs the City has implemented to divert waste from disposal facilities such as source reduction programs and recycling programs (e.g., Curbside Recycling Program, composting). The Framework states that for these programs to succeed, the City should site businesses at appropriate locations where recyclables could be handled, processed, and/or manufactured to allow a full circle recycling system to develop. The Framework further addresses the continuing need for solid waste transfer and disposal facilities. The Framework acknowledges the limited disposal capacity of the landfills located in Los Angeles and states that more transfer facilities will be needed to transport and dispose of waste at remote landfill facilities. The Framework also identifies waste-by-rail landfill disposal facilities that could be utilized by the City to meet its disposal needs.[44]

(c) City of Los Angeles Space Allocation Ordinance

Pursuant to AB 1327, the California Solid Waste Reuse and the Recycling Access Act of 1991, the City enacted the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171687) on August 13, 1997, which is incorporated in various sections of the Los Angeles Municipal Code (LAMC). The Ordinance sets forth the requirements for the inclusion of recycling areas or rooms within development projects.

b. Existing Conditions

The disposal of solid waste needs to be considered in the context of the regional and local levels as County landfills usually serve multiple jurisdictions.

(1) Regional

Solid waste in Los Angeles County is collected by over 250 private waste haulers and several city governments. Solid waste that is not recycled, reused, or transformed at a waste-to-energy facility is disposed of at a landfill. Landfills within Los Angeles County are generally classified either as Class III landfills, which accept non-hazardous solid waste, or unclassified (inert) landfills, which accept construction waste, yard trimmings, and earth-like

[44] *City of Los Angeles General Plan Framework http://www.lacity.org/PLN/Cwd/Framwk/chapters/09/09.htm#solidwaste, accessed January 17, 2007.*

waste. The County has eleven Class III landfills and three unclassified landfills.[45] As shown in Table IV.J-11 on page IV.J-61, in 2007, approximately 8.731 million tons of solid waste was disposed of in the County's Class III landfills.

In response to the increasing need for solid waste disposal and decreasing in-County landfill capacity, the County continually evaluates landfill needs and capacity through its preparation of the *Los Angeles County Countywide Integrated Waste Management Plan* annual reports. Within each annual report, future landfill disposal needs over the next 15 year planning horizon are addressed in part by determining the available landfill capacity. Landfill capacity is determined by several factors including: (1) the expiration of various landfill permits (e.g., land use permits, waste discharge requirements permits, solid waste facilities permits, and air quality permits); (2) restrictions to accepting waste generated only within a landfill's particular jurisdiction and/or watershed boundary; and (3) operational constraints. The most recent annual report was completed for 2006. As shown in Table IV.J-11, based on information from the *Los Angeles County Countywide Integrated Waste Management Plan 2006 Annual Report* (CoIWMP 2006 Annual Report), the 2008 remaining disposal capacity for the County's Class III landfills is estimated at 152.56 million tons. This remaining landfill capacity is declining and as a result, there continues to be a shortage of solid waste disposal capacity within the County.[46] Thus, the solid waste disposal needs of the County are increasingly being met by landfill facilities located outside of the County.

Without additional landfill capacity, it is projected that in-County disposal needs may exceed the future remaining permitted capacity. Due to the difficulties of establishing new landfills or expanding existing landfills, solid waste disposal at out-of-county facilities is necessary to meet future disposal needs.[47] Waste-by-rail allows the County to utilize out-of-county disposal facilities by transporting solid waste to remote facilities through use of an existing rail system. A waste-by-rail system consists of materials recovery facilities and transfer stations whereby recyclable materials are collected and remaining non-hazardous wastes are loaded into rail-ready shipping containers. The rail-ready shipping containers are delivered by truck to a local rail yard loading facility, where the containers are loaded onto rail cars and then transported by rail to remote landfills for disposal.

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[45] *Los Angeles County Integrated Waste Management Plan 2006 Annual Report. The Bradley Landfill closed in April 2007 and San Clemente Landfill is owned and operated by the U.S. Navy, thereby leaving eleven operational Class III landfills in Los Angeles County.*

[46] *Los Angeles County Integrated Waste Management Plan 2006 Annual Report.*

[47] *Solid Waste Management in Los Angeles County by Paul Alva, Los Angeles County Department of Public Works, http://ladpw.org/swims/Upload/Solid_Waste_Management_in_LA_County_9417.pdf, accessed April 30, 2007.*

Table IV.J-11
Solid Waste Disposal and Estimated Remaining Capacity for Los Angeles County Landfills

Landfill	Location	2007 Total Disposal (million tons)[a]	2008 Estimated Remaining Capacity (million tons)[b]	2013 Estimated Remaining Capacity (million tons)[p]
Class III				
Antelope Valley	Palmdale	0.077	9.11[f]	12.5
Bradley (closed)	Los Angeles	0.166	0.00	0.00
Burbank[c]	Burbank	0.038	2.96	2.8
Calabasas[d]	Unincorporated	0.463	7.43	5.0
Chiquita Canyon	Unincorporated	1.543	9.51[e]	33.7
Lancaster	Lancaster	0.417	13.06	9.1
Pebbly Beach[g]	Unincorporated	0.003	0.09	0.070
Puente Hills[h]	Unincorporated	3.756	22.84	2.3
San Clemente[i]	Unincorporated	0.001	0.02	0.0354
Scholl Canyon[j]	Glendale	0.4	6.0	3.6
Sunshine Canyon County	Unincorporated	1.15	77.25[k]	59.8
Sunshine Canyon City	Los Angeles	0.644		
Whittier[l]	Whittier	0.073	4.29	3.8
Class III Total Overall		**8.731**	**152.56**	**132.70**
Class III Total Open to City of Los Angeles		**8.62**	**145.20[m]**	**126**
Unclassified				
Azusa Land Reclamation	Azusa	0.124	36.416	Not available
Brand Park[n]	Glendale	0.00	0.69	Not available
Peck Road Gravel Pit	Monrovia	0.00	9.79	Not available
Unclassified Total Overall		**0.124**	**46.896**	
Unclassified Total Open to City of Los Angeles		**0.124**	**46.206[o]**	

[a] *Includes in-County and out-of-County solid waste disposal at landfill.*
[b] *2008 estimated remaining capacities were calculated by subtracting 2007 total disposal from the January 2007 estimated remaining capacities as provided in Appendix E-2.1 of the Los Angeles County Integrated Waste Management Plan 2006 Annual Report. Some estimated remaining capacities were modified as noted below.*
[c] *Limited to the City of Burbank use only*
[d] *Limited to Calabasas Wasteshed as defined by Los Angeles County Ordinance No. 91-0003.*
[e] *Does not include 2008 pending expansion which would increase capacity by 32 million tons.*
[f] *Does not include pending expansion of 8.96 million tons.*
[g] *Due to its location on Santa Catalina Island, only the City of Avalon and adjacent unincorporated County areas have access to this facility.*
[h] *Does not accept waste generated from portions of the City of Los Angeles outside the County Sanitation District boundary and Orange County.*
[i] *Owned and operated by U.S. Navy (Does not accept City of Los Angeles waste).*
[j] *Limited to Scholl Canyon Wasteshed as defined by City Ordinance No. 4782.*
[k] *Includes additional capacity of 73.4 million tons for both County/City portions of landfill approved by City of Los Angeles, California Integrated Waste Management Board, and Los Angeles County Board of Supervisors*
[l] *Limited to City of Whittier use only.*
[m] *Total excludes Class III landfills not open to the City of Los Angeles for disposal (i.e., Whittier, Burbank, Pebbly Beach, and San Clemente).*
[n] *Limited to City of Glendale use only.*
[o] *Total excludes unclassified landfills not open to the City of Los Angeles for disposal (i.e., Brand Park).*
[p] *Assumes that all proposed landfill expansions are approved, conversion technologies are implemented, and utilization of out-of-County landfills based on scenario IV of Appendix E-2.9 of the Los Angeles Countywide Integrated Waste Management Plan 2006 Annual Report.*

Sources: Matrix Environmental, 2009, based on information from the Los Angeles County Countywide Integrated Waste Management Plan 2006 Annual Report and the California Integrated Waste Management Board.

Within California, there are two landfills that are designed and permitted to receive waste via rail: the Mesquite Regional Landfill in Imperial County and the Eagle Mountain Landfill in Riverside County. In August 2000, the County Sanitation Districts of Los Angeles County (CSDLAC) entered into purchase agreements for both of these sites. Both sites are located approximately 200 miles east of Los Angeles along the Union Pacific Railroad. The Mesquite Regional Landfill is fully permitted to accept residual solid waste transported from Southern California communities by rail. The approved landfill footprint of 2,290 acres will provide capacity for approximately 600 million tons of solid waste and 100 years of operation at a maximum of 20,000 tons per day (tpd). CSDLAC, which completed the purchase of this facility in December 2002, expects the site to be operational by 2010 and ready for waste-by-rail in 2011/2012. Due to pending federal pending litigation, CSDLAC has not closed escrow on the purchase of Eagle Mountain Landfill.[48,49] If it does become operational, the Eagle Mountain Landfill would have a total capacity of 708 million tons allowing the facility to operate for over 100 years at a maximum of 20,000 tpd.

Additionally, in order to meet future disposal needs and address global climate change, the County is actively exploring and seeking the use of conversion technologies. Conversion technologies are an array of emerging technologies capable of converting post-recycling residual solid waste into useful products and chemicals, green fuels like ethanol and biodiesel, and clean, renewable energy. The County has recently 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.[50] 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.[51] The County has established a goal of implementing the demonstration project facility by December 2011.[52]

As stated in the CoIWMP 2006 Annual Report, with the use of waste-by-rail (out-of-county) landfills, expansion of in-county landfills, and conversion technologies for up to

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[48] *Sanitation Districts of Los Angeles County, http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=2900, accessed May 21, 2007.*

[49] *An oral argument was held with the 9th Circuit Court in 2007. As of March 2009, there has been no judgment from the 9th Circuit Court.*

[50] *Southern California Conversion Technologies Demonstration Project, http://www.socalconversion.org/, accessed October 17, 2008.*

[51] *Ibid.*

[52] *Los Angeles County Phase II Conversion Technology Evaluation Report - October 2007, http://www.socalconversion.org/pdfs/LACo_Conversion_PII_Report.pdf; accessed May 30, 2008.*

310,000 tpd of solid waste in 2021, the County projects that landfill capacity would be adequate to meet disposal needs for the next 15 years.[53]

Inert wastes such as soil, concrete, asphalt, and other C&D debris are disposed of at the County's three unclassified landfills. As shown in Table IV.J-11, approximately 0.124 million tons of inert waste was disposed of at the County's unclassified landfills in 2007. The 2008 remaining disposal capacity for unclassified landfills is estimated at approximately 46.896 million tons. Based on the average 2007 unclassified landfill disposal rate of approximately 0.124 million tons, unclassified landfills serving the County would have adequate capacity for the next 378 years. Thus, the County's unclassified landfills generally do not face capacity issues.

(2) Local

The City of Los Angeles Bureau of Sanitation and private waste haulers are responsible for the collection and hauling of solid waste within the City of Los Angeles. Generally, the Bureau of Sanitation provides waste collection services for single-family and some smaller multi-family developments while private haulers provide waste collection services for most multi-family residential and commercial developments. The City does not own or operate any landfill facilities. Thus, all solid waste within the City is disposed of at privately-owned facilities.

It should be noted that not all of the County's Class III landfills listed in Table IV.J-11 above are open to the City of Los Angeles for their solid waste disposal needs. Some of the County's Class III landfills only accept solid waste generated within a landfill's particular jurisdiction (i.e., Whittier, Burbank, Pebbly Beach, and San Clemente). As shown in Table IV.J-11, the 2008 remaining disposal capacity for the County's Class III landfills open to all or portions of the City of Los Angeles is estimated at 145.2 million tons. In 2007, the City of Los Angeles disposed of approximately 3.30 million tons of solid waste in the County's Class III landfills, with the majority of the solid waste going to the Chiquita Landfill, as well as the City and County portions of the Sunshine Canyon Landfill.[54] This amount accounts for approximately 38 percent of the total amount of solid waste disposed of in the County's Class III landfills for 2007, or 38 percent of the total amount of solid waste disposed of in the County's Class III landfills open to the City for 2007. These numbers do not include the amount of solid waste that was diverted via source reduction and recycling programs within the City.

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[53] *Los Angeles County Integrated Waste Management Plan 2006 Annual Report.*

[54] *Los Angeles County Department of Public Works, Detailed Solid Waste Disposal Activity Report by Jurisdiction of Origin (City of Los Angeles, January 2007to December 2007), http://dpwprod3.co.la.ca.us/swims/download/rpt_200782_10496_-1_11.pdf, accessed August 26, 2008.*

Similar to the County's Class III landfills, not all of the County's unclassified landfills listed in Table IV.J-11 above are open to the City of Los Angeles for their C&D waste disposal needs. Some of the County's unclassified landfills only accept C&D waste generated within a landfill's particular jurisdiction (i.e., Brand Park). As shown in Table IV.J-11, the 2008 remaining disposal capacity for the County's unclassified landfills open to the City of Los Angeles is estimated at 46.206 million tons. Based on the annual disposal rate of 0.124 million tons, the unclassified landfills serving the City would have adequate capacity for the next 372 years. In 2007, the City disposed of approximately 75,338 tons of C&D waste in the County's unclassified landfills, including Azusa Land Reclamation and Peck Road Gravel Pit.[55] This amount accounts for approximately 61 percent of the total amount of C&D waste disposed of in the County's unclassified landfills for 2007.

3. Project Impacts

a. Methodology

(1) Construction

For the analysis of solid waste impacts due to project construction, solid waste generation of C&D materials (e.g., asphalt paving) was estimated using generation factors prepared by the Environmental Protection Agency (EPA) and CIWMB. This estimated construction solid waste generation was then compared with the available capacity at the County's unclassified landfills open to the City of Los Angeles for their C&D waste disposal needs.

(2) Operation

For the analysis of solid waste impacts associated with project operation, the solid waste generation of the project's uses (e.g., residential, office, hotel, etc.) was estimated using the solid waste generation factors as provided by the *City of L.A. CEQA Thresholds Guide (2006)* and by CIWMB in a June 2006 Targeted Statewide Waste Characterization Study. The project's solid waste generation was then compared with the City's most recent (2007) disposal rate and the estimated 2013 (buildout year of the project) remaining capacity at Class III landfills open to the City of Los Angeles.

[55] *Ibid.*

b. Significance Thresholds

According to the *City of L.A. CEQA Thresholds Guide (2006),* the determination of significance shall be made on a case-by-case basis, considering the following factors:

- Amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates;
- Need for an additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and
- Whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, the CiSWMPP, the City Framework or the City Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.[56]

Based on these factors, a project would have a significant impact on solid waste if:

- The project generates solid waste at a level that would generate the need for an additional solid waste collection route or would require new or expansion of recycling or disposal facilities; or
- The project conflicts with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, City Framework or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

c. Project Design Features

The project would be designed and built to achieve certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program at the "Silver" level through the incorporation of green building techniques and other sustainability features. The project would include the following sustainability design features with regard to the management of solid waste materials:

- Divert at least 75 percent of construction and demolition debris from project construction from landfills.

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[56] *Waste diversion goals have been identified for a limited number of targeted waste generators and materials. Future updates of the SRRE may expand the land uses and materials covered, or modify the current waste diversion goals. http://www.lacity.org/san/solid_resources/pdfs/rfp-swirp-appendix-b3.pdf, accessed January 22, 2007.*

- Provide various locations on-site for the collection and storage of recyclable materials.

- Utilization of building materials with 20 percent as recycled-content building materials for the construction of the project uses.[57]

- Rehabilitate and reuse a portion of the existing buildings located on-site

d. Analysis of Project Impacts

(1) Construction

Construction of the project would require earthwork, demolition or renovation of existing buildings, as well as the construction of new buildings on the project site. Each of these activities would generate C&D waste including but not limited to soil, wood, asphalt, concrete, paper, glass, plastic, metals, and cardboard that would be disposed of in the County's unclassified landfills. Utilizing generation factors established by the EPA and CIWMB, the amount of C&D waste anticipated to be generated by the project was estimated. The generation factors are broken into various debris types (i.e., earthwork, demolition, renovation, and construction) and vary by use (i.e., residential or nonresidential). As shown in Table IV.J-12 on page IV.J-67, the project would result in the export of 190,000 cubic yards of soil, the demolition of 30,723 square feet of nonresidential uses, the renovation of 105,510 square feet of nonresidential uses, and the construction of 407,490 square feet of nonresidential uses and 586,000 square feet of residential uses. Based on these quantities, construction of the project is estimated to generate 199,500 tons of soil, 2,381 tons of demolition debris, 1,269 tons of renovation debris, and 2,076 tons of construction debris for a combined total of 205,226 tons of C&D waste as shown in Table IV.J-12. It is anticipated that some of the C&D waste generated would be recycled to the extent feasible. The remaining C&D waste would be disposed of at one of the County's unclassified landfills open to the City of Los Angeles for their C&D waste disposal needs. The project's total solid waste generation during construction would represent approximately 0.4 percent of the 2008 estimated remaining capacity at the County's unclassified landfills open to the City of Los Angeles for their C&D waste disposal needs. As previously discussed, based on the average 2007 unclassified landfill disposal rate, unclassified landfills open to the City would have adequate capacity for the next 372 years and generally do not face capacity shortages. Therefore, the County's unclassified landfills would have adequate capacity to accommodate project-generated inert waste. Thus, construction impacts relative to solid waste would be less than significant.

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[57] *This LEED® 4.1 credit requires the use of building materials with recycled content such that the sum of post-consumer recycled content plus one-half of the pre-consumer recycled content constitutes at least 20 percent of the total value of the total building materials in the project.*

Table IV.J-12
Estimated C&D Waste Generation

Debris Type	Quantity	Generation Factor (in pounds per unit) [a]	Waste Generation (in tons)
Earthwork			
Soil export	190,000 cubic yards	2,100 [c]	199,500
Demolition			
Nonresidential	30,723 square feet	155	2,381
Renovation			
Nonresidential	105,510 square feet	24.05 [d]	1,269
Construction			
Nonresidential	407,490 square feet [b]	3.89	793
Residential	586,000 square feet	4.38	1,283
Grand Total			**205,226**

[a] *Generation factors obtained from U.S. EPA, Report No. 530R98010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, except as noted below.*
[b] *Includes proposed hotel, office, retail, and restaurant/bar uses (513,000 square feet) minus renovation (105,510 square feet consisting of 91,110 square feet of office uses and 14,400 square feet of retail/restaurant uses).*
[c] *Based on CIWMB Conversion Calculation of 2,100 pounds per cubic yard for earth materials, http://www.ciwmb.ca.gov/leatraining/resources/cdi/tools/calculations.htm, accessed August 2, 2007.*
[d] *Generation factor for residential uses was utilized as no nonresidential generation factor available.*

Source: Matrix Environmental, 2009.

(2) Operation

The project site is currently developed with 136,233 square feet of studio/office uses that generate solid waste. Based on disposal rates established by CIWMB in a June 2006 Targeted Statewide Waste Characterization Study, it is estimated that these existing uses generate approximately 139 tons of solid waste per year as shown in Table IV.J-13 on page IV.J-68. The proposed residential, hotel, office (including entertainment-related office), retail, and restaurant/bar uses would also generate solid waste. Based on solid waste generation factors set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, as well as factors established by CIWMB in a June 2006 Targeted Statewide Waste Characterization Study, the residential uses would generate approximately 893 tons of solid waste per year, the hotel would generate approximately 252 tons of solid waste per year, the offices would generate approximately 380 tons of solid waste per year, and the retail and restaurant/bar uses would generate approximately 57 and 299 tons of solid waste per year, respectively. In total approximately 1,882 tons of solid waste per year as shown in Table IV.J-13. This is 1,745 tons of solid waste per year over existing uses. It is anticipated that some of the solid waste generated would be diverted via the project design features outlined above. Project-generated solid waste that is not recycled or reused would be disposed of at one of

Table IV.J-13
Existing and Proposed Solid Waste Generation

Land Use	Amount of Development	Employee Generation Factor[d]	Employees	Yearly Solid Waste Generation Factor[a]	Waste Generation (tons/year)
Existing					
Office/Studio[b]	136,233 sf	-	-	1,998 lbs per 1,000 sf.	136
Existing Total					**136**
Proposed					
Residential	400 units	-	-	4,463.9 lbs/household[c]	893
Hotel	125 rooms	0.80 employee per room	100	5,049 lbs per employee	252
Office	380,000 sf	-	-	1,998 lbs per 1,000 sf.	380
Retail	10,300 sf[e]	3 employee per 1,000 sf	31	3,714 lbs per employee[f]	57
Restaurant/Bar	31,000 sf[e]	3 employee per 1,000 sf	93	6,437 lbs per employee[g]	299
Proposed Total					**1,882**
Net Increase (Proposed – Existing)					**1,745**

[a] *Yearly solid waste generation factors based on June 2006 Targeted Statewide Waste Characterization Study: Waste Disposal and Diversion Findings for Selected Industry Groups prepared for CIWMB except as noted below.*

[b] *At the time of the Notice of Preparation for the Draft EIR, the project site included three buildings which were utilized as offices. Since then, however, these buildings have been demolished. While CEQA Guidelines Section 15125 generally defines baseline conditions as those which existed at the time of the NOP, for a conservative analysis,, solid waste generation associated with the office uses of these buildings are not taken into account within this analysis.*

[c] *Residential solid waste generation factor based on 12.23 lbs per household per day as set forth in L.A. CEQA Thresholds Guide (2006).*

[d] *Employment generation factors from SCAG Transportation Corridor Project (1989). These factors are recommended for use by the Community Redevelopment Agency, Hollywood and are as follows: 3 employees per 1,000 square feet of retail service uses and 0.80 employees per hotel room.*

[e] *The project would include a mix of retail and restaurant/bar uses that would total 41,300 sf. A maximum of 31,000 sf could be restaurant/bar uses. Therefore, since solid waste generation factors are higher for restaurants than for retail uses, it was assumed that the maximum development of restaurant uses (i.e., 31,000 sf) would occur.*

[f] *For retail, the "other stores" retail category was utilized versus the "big-box stores" retail category.*

[g] *For restaurant/bar, the "full-service restaurants" category was utilized versus the "fast-food restaurants" category.*

Source: Matrix Environmental, 2009.

the County's Class III landfills open to the City of Los Angeles for their solid waste disposal needs. The project's total solid waste generation during operation would represent an approximate 0.05 percent increase in the City's yearly solid waste disposal quantity (based on 2007 quantities), and represents approximately 0.001 percent of the 2013 estimated remaining capacity at the County's Class III landfills open to the City of Los Angeles (approximately 126 million tons). The calculated amount of project-generated solid waste does not take into account the amount of the project's waste that would be diverted and therefore, is a conservative estimate.

As described in the CoIWMP 2006 Annual Report, future disposal needs over the next 15 year planning horizon (2021) would be adequately met through the use of in-

County facilities, out-of-County landfills (such as the Mesquite Regional Landfill) as well as new conversion technologies.[58] It should also be noted that with each subsequent Annual Report, the 15-year planning horizon is extended by one year, thereby providing sufficient lead time for the County to address any future shortfalls in landfill capacity. Based on the above, project-generated waste would not exacerbate the existing shortfall of landfill capacity such that the projected timeline for the County's Class III landfills to reach capacity would be altered. The available capacity of the existing and/or planned landfills would not be exceeded, and impacts on solid waste generation from project operations would be less than significant.

(3) Consistency with Regulatory Framework

The project would include design features such as the provision of recycling containers on-site and adequate storage area for such containers in accordance with City Ordinance No. 171687. Additionally, as described above, the project would be designed and built to achieve certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) program at the "Silver" level, and thus, would include project design features to reduce solid waste generation. Additionally, the project would participate in the City's waste diversion programs (e.g., Curbside Recycling Program) to reduce the need for solid waste disposal. Therefore, the project would not conflict with solid waste regulations, plans, and programs. Impacts would be less than significant.

4. Cumulative Impacts

Section III of this EIR identifies 94 related projects that are anticipated to be developed within the vicinity of the project site. Development of these related projects would generate solid waste during their respective construction periods and on an on-going basis during their operation.

Construction of the project in conjunction with related projects would generate C&D waste and thus, would cumulatively increase the need for waste disposal at the County's unclassified landfills. As analyzed above, the project would generate 199,500 tons of soil, 2,381 tons of demolition debris, 1,269 tons of renovation debris, and 2,076 tons of construction debris for a combined total of 205,226 tons of C&D waste which constitutes approximately 0.4 percent of the 2008 estimated remaining capacity at the County's unclassified landfills open to the City of Los Angeles. Thus, the project's contribution to a

[58] *Los Angeles County Integrated Waste Management Plan 2006 Annual Report, June 2008, http://ladpw.org/swims/Upload/2005%20Annual%20Report%20-%20Signed_9618.pdf, accessed May 21, 2008. .*

cumulative impact on unclassified landfills would not be significant. Additionally, as stated above, the unclassified landfills open to the City have adequate capacity for the next 372 years. As such, future shortage of disposal capacity at unclassified landfills is not expected. Further, related projects would be subject to environmental review on a case-by-case basis and thus, are anticipated to recycle C&D waste to the maximum extent feasible. Based on the above, cumulative solid waste impacts due to project construction are concluded to be less than significant.

The estimated solid waste generation resulting from operation of related projects is shown in Table IV.J-14 on page IV.J-71. As indicated, based on solid waste generation factors set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, as well as factors established by CIWMB in a June 2006 Targeted Statewide Waste Characterization Study, the solid waste generation for related projects is forecasted to be 40,524 tons per year. In conjunction with the project, the total cumulative solid waste generation would be 42,406 tons of solid waste per year. However, these estimates of solid waste generation for the related projects do not take into account solid waste reduction measures that would be implemented and do not discount solid waste generation from existing uses that would be removed as part of related projects.

Based on the 42,406 tons of cumulative solid waste generated per year, the cumulative solid waste generation would be approximately 339,248 tons by 2021.[59] This would represent approximately 0.21 percent of the County's projected 164.2 million tons of waste disposal need through 2020.[60] As discussed above, the County anticipates that with the use of waste-by-rail (out-of-county) landfills, expansion of in-county landfills, and conversion technologies, future disposal needs for the next 15 years would be adequately met.[61] Given the small percentage of cumulative solid waste generation relative to the County's projected disposal need, cumulative impacts on landfill capacity are concluded to be less than significant.

Furthermore, it is anticipated that related projects would be subject to environmental review on a case-by-case basis to ensure that they would not conflict with AB 939 waste diversion goals or the solid waste policies and objectives in the City's SRRE or its updates, the CiSWMPP, and the General Plan Framework. Therefore, cumulative impacts to solid waste regulations, plans, and programs from implementation of the project and related projects would be less than significant.

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[59] *Based on an 8-year period beginning January 1, 2013 (build-out year of project), through the end of 2021.*

[60] *Los Angles County Integrated Waste Management Plan 2006 Annual Report June 2008.*

[61] *Ibid.*

Table IV.J-14
Cumulative Solid Waste Generation

Land Use	Amount of Development[b]	Employee Generation Factor[c]	Employees/ Students/ Patients	Yearly Solid Waste Generation Factor[d]	Waste Generation (tons/year)
Residential	11,129 units	-	-	4,463.9 lbs /household[e]	24,843
Hotel	1,287 rooms	0.80 employee per room	1,030	5,049 lbs per employee	2,600
Office	2,184,622sq. ft.	-	-	1,998 lbs per 1,000 sf	2,185
Retail	1,775,309sq. ft.	1 employee per 500 sf	3,551	7,798 lbs per employee (big-box) 3,714 lbs per employee (retail/ other stores)[f]	7,507
Restaurant/Bar	194,368 sq. ft.	1 employee per 500 sf	396	6,437 lbs per employee (full-service restaurants) 6,528 lbs per employee (fast-food restaurants)[g]	1,276
School	1,546 students	-	1,546	90 lbs per student[h]	70
Hospital	460 beds	-	460	1,131.5 lbs per patient	260
Gas Station	18,000 sf [i]	1 employee per 500 sf	36	3,714 lbs per employee (other stores)	67
Other[j]	462,162 sf	1 employee per 500 sf	924	3,714 lbs per employee (other stores)	1,716
				Related Projects Total	**40,524**
				Project Total	**1,882**
				CUMULATIVE TOTAL	**42,406**

[a] *Some land uses were excluded (Related Project No. 35) as no information regarding the size of the project (e.g.., square footage, number of units) were available.*
[b] *Based on new development of related projects.*
[c] *Yearly solid waste generation factors based on June 2006 Targeted Statewide Waste Characterization Study: Waste Disposal and Diversion Findings for Selected Industry Groups prepared for CIWMB except as noted below.*
[d] *For a conservative analysis, employment generation factors from SCAG Transportation Corridor Project, 1989 were utilized.*
[e] *Residential solid waste generation factor based on 12.23 lbs per household per day as set forth in the L.A. CEQA Thresholds Guide (2006).*
[f] *For retail, Related Project No.82 (Target-Sunset Shopping Center) assumed as Big Box; All others assumed as retail/other stores.*
[g] *For restaurant/bar, the "full-service restaurants" category was utilized except for Related Project Nos. 3 and 79 where "fast-food restaurants" were utilized.*
[h] *Based on 0.5 lbs per student per day at 180 days per school year.*
[i] *Assuming 1,000 sf per fuel pump for 18 pumps*
[j] *Other uses include museum (Related Project Nos. 48, 81, 86), chapel (Related Project No.61), soundstage (Related Project No. 45), and etc.*

Source: Matrix Environmental, 2009.

5. Mitigation Measures

Based on the above analysis, with implementation of the project design features, impacts with regard to solid waste would be less than significant. Nonetheless, the following mitigation measures are recommended to ensure that specific project design features would be incorporated and to further reduce impacts.

Mitigation Measure J-4: The construction contractor shall only contract for waste disposal services with a company that recycles demolition and construction-related wastes. The contract specifying recycled waste service shall be presented to the Department of Building and Safety prior to issuance of demolition or construction permits.

Mitigation Measure J-5: To facilitate on-site separation and recycling of demolition and construction-related wastes, the construction contractor should provide temporary waste separation bins on-site during demolition and construction of the project.

b. Operation

Mitigation Measure J-6: Recycling bins shall be provided at appropriate locations on the project site to promote recycling of paper, metal, glass, and other recyclable materials.

6. Level of Significance After Mitigation

Based on the above analysis, impacts with regard to solid waste would be less than significant.

IV. Environmental Impact Analysis

K. Population, Housing, and Employment

1. Introduction

This section addresses the potential population, housing, and employment effects of the project in the context of the local area (the Hollywood Community Plan), the subregion (City of Los Angeles), and the region (County of Los Angeles) within which the project site is located. Specifically, the analysis evaluates the project's population, housing, and employment effects in relation to the adopted growth forecasts of the Southern California Association of Governments and relevant policies and programs.

2. Environmental Setting

a. Regulatory Framework

(1) Regional Level

The project is located within the jurisdiction of the Southern California Association of Governments (SCAG). SCAG is a Joint Powers Agency established under California Government Code Section 6502 et seq. Pursuant to federal and state law, SCAG serves as a Council of Governments, a Regional Transportation Planning Agency, and the Metropolitan Planning Organization (MPO) for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial counties. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan and Guide (RCPG), Regional Transportation Plan (RTP), and Regional Housing Needs Assessment (RHNA), in coordination with other state and local agencies. These documents include population, housing, and employment projections for the region and 14 subregions, including the City of Los Angeles.

(a) Regional Comprehensive Plan and Guide

SCAG prepared the RCPG in conjunction with its constituent members and other regional planning agencies. Adopted in May 1995 and revised in April 2001, the RCPG is intended to serve as a framework to guide decision-making throughout the region with respect to the growth and changes that can be anticipated by the year 2015 and beyond.[1] The goals, objectives and policies in the RCPG are relevant yardsticks for measuring consistency of local plans against regional objectives. The authority and responsibility for land use and other critical planning decisions rest with individual city and county governments. Notwithstanding, the RCPG proposes a strategy for local governments to voluntarily use to address issues related to future growth and to provide a means for assessing the potential impact of projects within the context of the region.

The RCPG includes five core chapters that respond directly to the federal and state requirements placed on SCAG. These chapters, Growth Management, Regional Mobility, Air Quality, Water Quality, and Hazardous Waste Management, form the basis for the certification of local plans. Ancillary, or non-mandated, chapters within the RCPG, including Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Waste Management, reflect other regional plans but do not contain actions or policies required of local governments.

The three chapters of the RCPG particularly relevant to the issue of population, housing and employment are the Growth Management, Housing, and Economy chapters.

The Growth Management Chapter of the RCPG, adopted in June 1994, is a mandated section that presents population, housing, and employment forecasts thereby establishing the socio-economic parameters for growth and development in the region. These forecasts serve as baseline data for chapters of the RCPG such as the Regional Mobility and Air Quality Chapters.[2] The Growth Management Chapter also addresses issues related to growth and land use by providing guiding principles for development that support the overall goals of the RCPG.

The Housing Chapter of the RCPG, adopted in September 1994, is not mandated and does not establish any specific requirements for local governments. Nonetheless, SCAG is responsible for assisting cities and counties in fulfilling their statutory obligations

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[1] *A Draft 2008 Regional Comprehensive Plan has been released for public review and comment, but has not yet been adopted.*

[2] *The 2008 Regional Transportation Plan provides updated population, housing, and employment projections.*

to prepare and regularly update the Housing Elements of their General Plans. Accordingly, the Housing Chapter of the RCPG provides a broad picture of housing issues affecting the region to assist local governments in meeting their statutory requirements. By providing a regional framework for local housing strategies that are responsive to market area needs and state mandates, the Housing Chapter is a major tool for coordinating local housing development strategies within Southern California. It also includes a set of goals associated with increasing the supply of housing in the region, particularly housing that is affordable to low- and moderate-income households. No formal policies are provided. The RHNA provides more recent data regarding housing needs.

Finally, the Economy Chapter of the RCPG, a non-mandated section, assesses the region's economy, the trends that brought it to its current state, and projected changes in the future. The Economy Chapter discusses strengths and weaknesses of the region's economy, where opportunities lie in the future (i.e., types of jobs anticipated for the SCAG region in the future), and strategies to enhance the region's competitiveness in the national and world economy. No formal policies are included.

(b) Regional Transportation Plan

On May 8, 2008, the Regional Council of SCAG adopted the 2008 Regional Transportation Plan: Making the Connections (RTP). The RTP contains a set of baseline socioeconomic projections that is used as the basis for SCAG's transportation planning. The projections include total population, households, and employment at the regional, county, subregional, jurisdictional, census tract, and transportation analysis zone levels. The 2008 RTP uses 2003 as the base year with projections for the years 2005, 2010, 2015, 2020, 2025, 2030, and 2035. The RTP identifies the amount of expected growth in the region and provides the expected distribution of that growth. The RTP also sets forth the goals to maximize mobility and accessibility, ensure safety and reliability, preserve our transportation system, maximize productivity of our system, protect the environment and encourage land-use and growth patterns that complement our transportation system.[3]

(c) Regional Housing Needs Assessment

A Regional Housing Needs Assessment (RHNA), most recently adopted and approved by the SCAG Regional Council on July 12, 2007, includes an assessment of regional housing needs for very low income, low income, moderate income, and above

[3] *In a May 24, 2007 response letter to the NOP for the project, SCAG provided 2004 SCAG forecasts for the region, subregion, and City pertaining, However, since that time, more recent 2008 SCAG forecasts have become available. Therefore, the recent 2008 SCAG forecasts were used in the project analysis.*

moderate income groups for the planning period from January 2006 through June 2014.[4] The RHNA is used by local communities to address land use planning, prioritize local resource allocation, and decide how to address identified existing and future housing needs resulting from population, employment, and household growth. According to the RHNA, the housing needs for the City of Los Angeles include a total of 112,876 dwelling units of which 27,238 would be very low income housing, 17,495 low income, 19,304 moderate income, and 48,839 above moderate income housing.

(2) City Level

(a) City of Los Angeles General Plan

The General Plan of the City of Los Angeles is a policy document originally adopted in 1974 that serves as a comprehensive, long-term plan for future development of the City. The General Plan sets forth goals, objectives and programs to guide land use policies and to meet the existing and future needs of the community, while integrating a range of State-mandated elements including Land Use, Transportation, Noise, Safety, Housing, Open Space, and Conservation. Two major components of the General Plan are the Citywide General Plan Framework Element and the Land Use Element, the latter of which comprises 35 local area plans known as Community Plans that guide land use at the local level. The project site is located within the boundaries of the Hollywood Community Plan. These documents are discussed further below.

(i) General Plan Framework

The Citywide General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, establishes the conceptual basis for the City's General Plan. The General Plan Framework is a strategy for long-term growth that sets a context to guide amendments of the City's Community Plans, zoning ordinances, and other pertinent programs. The General Plan Framework defines Citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. General Plan Framework land use policies are further guided at the community level through the Community Plan.

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[4] *Southern California Association of Governments, website: http://www.scag.ca.gov/Housing/pdfs/rhna/RHNA_FinalAllocationPlan071207.pdf, accessed September 2007.*

The purpose of the Housing Chapter is to present an overview of the critical issues related to housing in Los Angeles, provide goals to guide future action, and specify policies to address housing issues. The following Housing Chapter policies are applicable the project:

Policy 4.1.1-Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City sub-region to meet the twenty-year projections of housing needs.

Objective 4.2-Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher density development and surrounding lower density residential neighborhoods.

(b) Hollywood Community Plan

The Hollywood Community Plan (1988) is one of 35 community and district plans established for different areas of the City that are intended to implement the policies of the General Plan Framework. The Hollywood Community Plan is currently in the process of being updated by the City of Los Angeles.[5] According to the current Hollywood Community Plan, the 2010 residential population of Hollywood is projected to be approximately 219,000 persons.

b. Existing Conditions

(1) On-Site Conditions

The project site is currently developed with four structures of the Columbia Square Complex 1 occupying a total of 136,233 square feet of floor area that front along Sunset Boulevard. These buildings are currently utilized as entertainment-related, production, and post-production offices and studios. While the project site currently generates employees associated with the short-term, entertainment-related, production and post-production office and studio uses, no housing and thus, no residential population exists on the site.

[5] *The Draft EIR for the Hollywood Community Plan Update is expected to be completed and released in early 2009 for public review and comment. Final adoption of the updated Hollywood Community Plan is still pending.*

(2) Demographic Analysis Areas

The project site lies within the County of Los Angeles, City of Los Angeles, and Hollywood Community demographic areas. The regional area of the County of Los Angeles includes five subregions, 88 incorporated cities, and many unincorporated areas. The subregional area of the project site is the City of Los Angeles. The local area is the Hollywood Community. Table IV.K-1 on page IV.K-7 discusses the conditions relating to population, employment, and housing for the Local, Subregional, and Regional Areas in 2005.

As shown in Table IV.K-1, in 2007, the Hollywood Community had an estimated population of approximately 224,900 residents, 97,100 households, and 111,432 employees. The City of Los Angeles had approximately 4,004,000 residents, 1,321,000 households, and 1,786,898 employees. The regional area of Los Angeles County had a total residential population of approximately 10,369,902, approximately 3,270,580 households, and 4,459,174 employees.

c. Projections and Trends

The 2008 RTP provides data on projected population, housing, and employment at various geographical levels within the SCAG region. The following discussion provides an overview of the projections and trends anticipated for population, employment, and housing in relation to the project. As the project is expected to be completed by 2013, the population increase within the SCAG region has been adjusted from 2008 to 2013. The SCAG projections for population, employment, and housing are shown in Table IV.K-1.

According to SCAG's regional forecast, the population will increase in all geographic zones between 2007 and 2013. In the local Hollywood Community Plan Area, the population is expected to increase approximately 7.36 percent between 2007 and 2013. During the same time period, the City of Los Angeles population is projected to increase approximately 2.39 percent, and the regional population is expected to grow by 4.43 percent.

As shown in Table IV.K-1, the SCAG housing forecasts indicate that the number of households in the Hollywood Community Plan Area is projected to increase by approximately 11.43 percent between the years of 2007 and 2013. During the same years, the number of households is expected to increase in the subregional and regional areas by 6.10 percent and 5.45 percent, respectively.

Table IV.K-1
Population, Housing, and Employment Projections

Geographic Zone	Estimated 2007	Projected 2010	Projected 2013	Projected 2015	2007–2013 Growth	2007–2013 Percentage Change (%)
Population						
Local Area						
Hollywood Community Plan Area	224,900	239,061	241,445	243,035	16,545	7.36%
Subregional Area						
City of Los Angeles	4,004,000	4,057,484	4,099,869	4,128,125	95,869	2.39%
Regional Area						
Los Angeles County	10,369,902	10,615,732	10,829,252	10,971,598	459,350	4.43%
Households						
Local Area						
Hollywood Community Plan Area	97,100	105,487	108,201	110,010	11,101	11.43%
Subregional Area						
City of Los Angeles	1,321,000	1,366,985	1,401,615	1,424,701	80,615	6.10%
Regional Area						
Los Angeles County	3,270,580	3,357,798	3,448,867	3,509,580	178,287	5.45%
Employment						
Local Area						
Hollywood Community Plan Area	111,432	113,407	114,981	116,031	3,550	3.19%
Subregional Area						
City of Los Angeles	1,786,898	1,820,092	1,846,473	1,864,061	59,575	3.33%
Regional Area						
Los Angeles County	4,459,174	4,552,398	4,626,484	4,675,875	167,310	3.75%

Source: Matrix Environmental, 2009.

Employment in the Hollywood Community Plan Area is projected to increase by approximately 3.19 percent between 2007 and 2013. Employment in the subregional and regional area is also projected to increase by 3.33 percent, and 3.75 percent, respectively, during the same time period.

3. Project Impacts

a. Methodology

The population and housing analysis consists of a comparison of the project's proposed development and estimated population and employment to expected forecasted SCAG projections for the years 2007 to 2013 for the three geographic areas. The analysis

addresses impacts at the local (Hollywood Community), subregional (Los Angeles City), and regional (Los Angeles County) areas. The analysis also evaluates the project's estimated population, housing, and employment and its compatibility with SCAG projections and related policies applicable to the project area.

b. Significance Thresholds

According to the *City of L.A. CEQA Thresholds Guide (2006)*, the following factors determine the level of significance on a case-by-case basis:

- The degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/build-out, and that would result in an adverse physical change in the environment.
- Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Hollywood Community Plan or City of Los Angeles General Plan.
- The extent to which growth would occur without implementation of the project.

c. Project Design Features

The project would redevelop an underutilized property to provide a vertically integrated mix of uses that will assist in promoting Hollywood as a center of population, employment, retail services and entertainment. Specifically, the project would provide approximately 400 residential units, a 125-room hotel, approximately 380,000 square feet of office space, and 41,300 square feet of retail space and restaurant/bar uses (including retail and restaurant/bar uses in the hotel). Included within these project uses, approximately 105,510 square feet of the existing 136,233-square-foot Columbia Square Complex would be rehabilitated to provide for approximately 91,110 square feet of office uses and 14,400 square feet of retail and restaurant/bar uses. The provision of 400 residential units that would provide new housing opportunities with contemporary amenities and design features would assist in alleviating the existing regional housing needs of the Hollywood Community and the City of Los Angeles. In addition, the project would provide new employment opportunities to a currently underutilized site.

d. Analysis of Project Impacts

(1) Construction

Project development would generate construction workers on-site at any one time during the demolition, grading and excavation, and building construction and finishing phases. However, individual construction projects would not necessarily generate new employment within the region. Rather, there is a pool of construction workers who move from project to project and are somewhat mobile. To the extent that the project supports and contributes to the pool of construction workers, its impacts would be considered beneficial. Since construction activities related to the project would not exceed expected growth, construction-related employment impacts would be less than significant.

(2) Operation

As previously discussed, the project would develop 400 residential units. Based on the current household size of 2.27 residents per household in the Hollywood Community Plan area, the project would result in the generation of approximately 908 new residents.[6] The estimated residential population increase associated with the project was compared to the expected population increase during the 2007 to 2013 period for the local, subregional, and regional areas. Table IV.K-2 on page IV.K-10 shows the project's population increase in relation to the three geographic areas. As shown, the project's residential population of 908 new residents would represent a total of 5.49 percent, 0.95 percent, and 0.20 percent of the population growth projected by SCAG for the local, subregional, and regional areas, respectively, from 2007 to 2013.

The project would include the development of 400 new residential dwelling units. As shown in Table IV.K-2, the 400 new dwelling units would represent 3.60 percent, 0.50 percent, and 0.22 percent of the total household growth projected by SCAG for the local, subregional, and regional areas, respectively.

The project would generate approximately 1,727 net new employees to the project site. As presented in Table IV.K-2, the number of net new employees generated by the project represents approximately 48.65 percent, 2.90 percent, and 1.03 percent of SCAG's overall employment growth projections for the local, subregional, and regional areas,

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[6] *City of Los Angeles Department of City Planning, Demographics Research Unit, Hollywood Community Plan area – 2007 Population Estimate Household Occupancy online at http://cityplanning.lacity.org/DRU/Locl/LocFrame.cfm?geo=CP&loc=Hwd&sgo=CT&rpt=PnH&yrx=07; accessed August 26, 2008.*

Table IV.K-2
Project Population, Household, and Employment Impacts

	Local Area	Subregional Area	Regional Area
Population			
Net New from Project	908	908	908
Projected Growth (2007 to 2013) [a]	16,545	95,869	459,350
Percent of Growth	5.45%	0.95%	0.20%
Households			
Net New from Project	400	400	400
Projected Growth (2007 to 2013) [a]	11,101	80,615	178,287
Percent of Growth	3.60%	0.50%	0.22%
Employment			
Project	1,727	1,727	1,727
Projected Growth (2007 to 2013) [a]	3,550	59,575	167,310
Percent of Growth	48.65%	2.90%	1.03%

[a] *Growth projected to occur between 2007 and 2013 based on SCAG data.*

Source: Matrix Environmental based on SCAG 2008 RTP projections, 2009.

respectively. While project employees would comprise a large portion of the employment growth forecasted for the local area, given the current economic trends, project employment would represent a positive contribution to the tax base of the area (and the City as a whole).

Overall, the project's anticipated population, housing, and employment growth would not exceed SCAG's forecasted growth projections for the Hollywood Community Plan Area. The anticipated growth also would be consistent with SCAG's subregional and regional growth projections. The project anticipates providing a wide range of dwelling units which would help to meet the housing demands in the City and the Hollywood Community in particular. In addition, while the project would create an increase in job opportunities that could potentially increase housing demand to a commercial corridor area in need of housing, the project would add 400 quality housing units to meet housing demand. Lastly, the project site is located in an urban area already served by existing infrastructure and an established transportation system, and the proposed mix of uses would provide a balance of jobs and housing, and would cluster development so as to create an activity center and provide for the efficient provision of infrastructure. While the project would provide new connections to existing utility systems and would include on-site fire prevention and safety measures to reduce demand for fire and police services, such improvements would not cause population growth or accelerate development in an unplanned area that exceeds projected/planned levels. For the reasons described above, potential impacts relative to population, housing, and employment growth would be less than significant.

(3) Consistency with Regulatory Framework

The goals, policies, and objectives in the various plans described above support housing and employment needs at the local, subregional, and regional levels. The intent is to meet all future needs in a manner that is consistent with expected projections. The following discussion addresses the project's relationship to this intent.

(a) Contributions to Housing and Employment Opportunities

The SCAG RCPG policies described above include two policies that encourage and support the development of additional housing. RCPG Policy 3.24 states, "Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment." RCPG Policy 3.17 states, "Support and encourage settlement patterns which contain a range of urban densities." Further, the housing projections and needs identified in the RTP and the RHNA both identify considerable amounts of new housing that is needed in order to meet the growing population needs of the three demographic areas analyzed. The RTP projections, pursuant to RCPG Policy 3.01, are the policies used by SCAG in all phases of implementation and review. While the previous subsection of this analysis pointed out that the project would not exceed projections, here it may be noted that the project's 400 dwelling units would make a contribution to creation of needed housing stock, and would thus support SCAG policies and projections.

Project development of 400 new residential units would also support the policies of the City of Los Angeles General Plan Framework. As stated above, Policy 4.1.1 requires the project to "provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City sub-region to meet the twenty-year projections of housing needs." Objective 4.2 states, "encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher density development and surrounding lower density residential neighborhoods." The project would accommodate various income levels by providing a mix of one- to three-bedroom units. The provision of new housing as part of the project would assist in addressing the housing shortage that currently exists throughout the City and Hollywood in particular. In addition, the location of high-density housing in a commercial area such as the project vicinity would increase housing within the community while preserving the lower density residential neighborhoods. As such, the project would be consistent with applicable policies regarding population, housing, and employment, and therefore, impacts would be less than significant.

4. Cumulative Impacts

Table IV.K-3 on page IV.K-13 provides a list of the known residential projects within the local, subregional, and regional areas that were identified and presented in Section III, Environmental Setting, of this EIR. The SCAG RTP forecasted population and household growth is provided in Table IV.K-1. The cumulative growth of the project and related projects relative to population and housing in the subregional and regional areas are presented below in Table IV.K-4 on page IV.K-15. Cumulative growth was not analyzed within the local context as many of the related projects are not located in the same local area as the project (i.e., the Hollywood Community Plan area). However, all of the related projects are located within the same subregional and regional areas as the project.

The subregional and regional cumulative population increase that would result from the project in combination with the related projects would total 26,171 people. Compared to the SCAG-projected population increase of 95,869 for the subregional area, the cumulative population would represent 27.30 percent of the SCAG-projected growth. Compared to the SCAG-projected population increase of 178,287 for the regional area, the cumulative population would represent 5.70 percent of the SCAG-projected growth.

The cumulative housing growth in the subregional and regional areas attributed to the project in combination with the related projects would be 11,529. Compared to the SCAG-projected housing increase of 80,615 for the subregional area, the cumulative households would represent 14.30 percent of the SCAG-projected growth. Compared to the SCAG-projected housing increase of 178,287 for the regional area, the cumulative total would represent 6.47 percent of the SCAG-projected growth.

With regard to cumulative employment growth, related projects would generate approximately 16,909 employment opportunities. Combined with the project's estimated 1,727 employees, the cumulative employment total would be 18,636, which would represent 31.28 percent of the subregional employment growth and 11.14 percent of the regional employment growth. While cumulative employment growth would represent a noticeable percentage of the forecasted growth, such cumulative employment growth would be considered beneficial to the City and the regional economy, especially given the current market conditions.

Overall, cumulative population, housing, and employment projections for the local, subregional and regional level would be below SCAG projections and therefore, would be less than significant. As such, impacts related to population, housing, and employment would be less than significant.

Table IV.K-3
Subregional and Regional Area - Related Projects and Project Cumulative Population and Housing Growth

Related Project No.	Project	Address	Condos	Apts	Total Residential Units	Population
7	Sunset Legacy Lofts	7950 Sunset Bl		183	183	415
9	Apartments & retail	5920 Melrose Av		54	54	123
10	Park La Brea Apt Addition	6300 3rd St		300	300	681
11	Mixed-Use	5600 Wilshire Bl		288	288	654
12	Mixed-Use	648 Western Av		240	240	545
13	Fairfax Av Mixed-Use	801 Fairfax Av		93	93	211
14	Apartments	5165 Fountain Av		110	110	250
15	Apartments & retail	922 Western Av		63	63	143
16	Apartments	6142 Franklin Av		130	130	295
17	Condos & retail	600 Hobart Bl	70		70	159
18	Apartments	3800 Wilshire Bl		91	91	207
19	Condos	6735 Yucca St	54		54	123
20	Apartments	6298 3rd St		300	300	681
21	Condos	1714 Mc Cadden Pl	218		218	495
24	Mixed-Use	1611 La Brea Av	180		180	409
26	Hollywood/Garfield Mixed Use	5555 Hollywood Bl		108	108	245
27	Condos	1736 Mc Cadden Pl	218		218	495
28	Mixed-Use	5400 Hollywood Bl		42	42	95
31	Mixed-Use	1717 Vine St	57		57	129
32	Mixed-Use	3670 Wilshire Bl	378		378	858
33	Desmond's Tower Res. Dev.	5500 Wilshire Bl		175	175	397
34	Mixed-Use	4500 Los Feliz Bl	80		80	182
35	Mixed-Use	450 Western Av			0	0
36	Hollywood & Vine Mixed-Use	6250 Hollywood Blvd	150	375	525	1,192
37	Mixed-use	5651 Santa Monica Bl		437	437	992
41	BLVD 6200 (south) - mixed-use	6200 Hollywood Bl		952	952	2,161
42	Mixed-Use	694 Hobart Bl	242		242	549
43	Mixed-use	6915 Melrose Av	13		13	30
44	Third Street Mixed-Use Project	5863 3rd St.		60	60	136
46	Sunset & Gordon Mixed-use (Old Spaghetti Factory)	5935 Sunset Bl	144		144	327
47	Sunset & Vine Mixed-Use	1538 Vine St		306	306	695
49	Argyle Lofts	1800 Argyle Av		73	73	166
51	Apts & retail (1/2 of blk Yucca & Highland & McCadden)	6758 Yucca St		270	270	613
52	La Brea Urban Lofts	101 La Brea Av	118		118	268
56	Condos & retail	5663 Melrose Av	96		96	218
57	HK Town Project (Mixed-Use)	100 Western Ave		187	187	424
59	Mixed-use residential and retail	3324 Wilshire Boulevard	108		108	245
60	Residential Development	6001 Carlton Wy	42		42	95
62	Mixed-use residential, retail and restaurant	6677 Santa Monica Blvd		787	787	1,786

Table IV.K-3 (Continued)
Subregional and Regional Area - Related Projects and Project Cumulative Population and Housing Growth

Related Project No.	Project	Address	Condos	Apts	Total Residential Units	Population
63	Mixed-use residential and retail	6100 Hollywood Blvd		151	151	343
64	Mixed-use	6230 Yucca St	85	10	95	216
65	Mixed-use (68 assisted-living apts w/ ret. & comm. spcs)	5245 Santa Monica Bl		68	68	154
68	Mixed-use residential and retail	6911 Santa Monica Blvd	374		374	849
69	Wilshire La Brea High Rise	5200 Wilshire Bl		332	332	754
70	Mixed-Use	3200 Beverly Bl		32	32	73
71	Hollywood Passage (Mixed-use)	5550 Hollywood Bl	216		216	490
74	Almond Tree Village	3400 3rd St	147	261	408	926
77	Mixed-Use Project	915 La Brea Av		219	219	497
78	Hollywood Production Center	1149 Gower St	36	21	57	129
83	Highland Center Mixed-Use Project	1600 N Highland Ave	496		496	1,126
84	Lanewood Condos	7045 W Lanewood Ave	43		43	98
88	Condominiums	1645 Vine St	96		96	218
92	Broadstone Hollywood	7060 Hollywood Bl	130		130	295
93	Palladium	6215 Sunset Bl	170		170	386
94	Capital Records Tower	1750 Vine St		450	450	1,022
			Related Project Total		**11,129**	**25,263**
				Project Total	**400**	**908**
				GRAND TOTAL	**11,529**	**26,171**

Source: Matrix Environmental, 2009.

a. Consistency with Regulatory Framework

The cumulative development would contribute to meeting housing and employment needs that have been identified in needs assessments. This development would support the various plans, policies, goals, and objectives that identify the provision of such development. In so doing, the cumulative development may address the housing needs of some segments of the housing market more than others. However, the provision of such housing would not have adverse effects on the future provision of additional housing to meet specialized needs pursuant to the plans.

Table IV.K-4
Subregional and Regional Cumulative Population and Housing Impacts
Proposed and Related Projects

				SCAG RTP 2007-2013 Projected Growth		Cumulative Total as a Percent of SCAG-Projected Growth (%)	
	Project	Related Projects	Cumulative Total	Subregional Area	Regional Area	Subregional Area	Regional Area
Population	908	25,263	26,171	95,869	459,350	27.30	5.70
Households	400	11,129	11,529	80,615	178,287	14.30	6.47
Employment	1,727	16,909	18,636	59,575	167,310	31.28	11.14

Source: Matrix Environmental, 2009 based on SCAG 2008 RTP data on July 2008.

Therefore, the cumulative development would support many policies and would not substantially interfere with the attainment of other policies. The cumulative development would be compatible with local and regional housing policies. Cumulative impacts with regard to consistency with applicable plans would be less than significant.

5. Mitigation Measures

No mitigation measures would be necessary as impacts on population, housing, and employment would be less than significant.

6. Level of Significance After Mitigation

No mitigation measures are necessary as project impacts on population, housing, and employment would be less than significant.