



Environmental Review Section

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



INITIAL STUDY / MITIGATED NEGATIVE DECLARATION HOLLYWOOD COMMUNITY PLAN AREA

904 La Brea Project

Case No. CPC-2014-4074-GPA-ZC-HD-ZAA-SPR

ENV No. ENV-2014-4075-MND

Council District No. 4

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

Project Addresses: 900, 904, 906, 912, 916, 922, 926, 932 N. La Brea Ave. and 7069 Willoughby Ave., Los Angeles, CA 90038

Project Description: The Project Site is located on the northeast corner of N. La Brea Avenue and Willoughby Avenue. The Project Site is rectangular-shaped with commercial uses adjacent to the north, an alley and commercial uses to the east, commercial uses across La Brea Avenue to the west, and retail use to the south across Willoughby Avenue. The Site is approximately ½ block south of the City of West Hollywood border at Romaine Street. The total area that composes the Project site is approximately 50,012.8 square feet (or 1.148 acres). The Project Site is in the Hollywood Community Plan Area, zoned MR1-1 (Restricted Industrial Zone, Height District 1), the General Plan land use designation for the Site is Limited Manufacturing, and the Site is within the Los Angeles State Enterprise Zone (ZI-2374). The Project Site's northern half contains two buildings operating as storage space and the southern half contains vacant land (formerly occupied with retail buildings which were removed). The Project would remove all existing uses and buildings. The Project would be an approximately 150,000 square foot, 7-story (75 feet) mixed-use building with approximately 37,385 square feet of ground-floor retail, and approximately 169 residential apartments on levels 2 through 7. Retail parking would be provided in one subterranean level and residential parking would be provided on levels 2 and 3. The Project will require approval of the following:

Discretionary

1. A General Plan Amendment to amend the Hollywood Community Plan to re-designate the Project Site from Limited Manufacturing to Neighborhood Commercial;
2. A Vesting Zone Change from MR1-1 to C2-2D;
3. Site Plan Review for a development creating more than 50 dwelling units;
4. A Zoning Administrator's Adjustment to permit a five-foot side yard setback on the northern boundary of the Project Site at the first and second residentially-used levels in lieu of the 9 feet otherwise required; and
5. Haul Route permit to export up to 30,000 cubic yards of materials.

Ministerial

6. A 35% increase in base density for setting aside 11% of base density for Very Low Income households.

APPLICANT:

904 North La Brea (LA) Owner, LLC

PREPARED FOR:

Los Angeles Department of City Planning

PREPARED BY:

CAJA Environmental Services, LLC

January 2015

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APPENDICES

- A Air Quality, Noise, and Greenhouse Gases Appendices, DKA Planning, September 2014.
- B Sacred Lands File Search, Native American Heritage Commission, July 11, 2014.
- C-1 Geotechnical Engineering Investigation, Proposed Retail Structure, 904, 926 and 932 North La Brea Avenue, Los Angeles, CA, Geotechnologies, Inc, April 1, 2014, Updated Aug. 11, 2014.
- C-2 Supplemental Geotechnical Findings, Results of Cone Penetration Testing, Proposed Retail Structure, 904, 926 and 932 North La Brea Avenue, Los Angeles, California, Geotechnologies, Inc, May 12, 2014.
- C-3 Soils Report Approval Letter, Los Angeles Department of Building and Safety, April 23, 2014.
- C-4 Change to Project Description Letter, Geotechnologies, Inc, September 5, 2014.
- D-1 Phase I Environmental Site Assessment 904 N. La Brea Avenue, TOR Environmental, Inc., November 25, 2013, Revised July 23, 2014.
- D-2 Phase I Environmental Site Assessment 926 and 932 N. La Brea Avenue, TOR Environmental, Inc., November 20, 2013, Revised August 25, 2014.
- D-3 Comprehensive Asbestos Survey Report, 900-932 N. La Brea, ENV America, April 30, 2014.
- D-4 Lead Survey Report, 900-932 N. La Brea Avenue, ENV America Inc., April 29, 2014.
- D-5 Methane Test Data, GeoKinetics, October 6, 2014.
- E-1 Response from Los Angeles Fire Department, July 25, 2014.
- E-2 Response from Los Angeles Police Department, July 22, 2014.
- E-3 Response from Los Angeles Unified School District, July 7, 2014
- E-4 Response from Los Angeles Department of Recreation and Parks, July 29 2014.
- E-5 Response from Los Angeles Public Library, July 30, 2014.
- F-1 Traffic Impact Analysis for Mixed-Use Project, Overland Traffic Consultants, Inc., July 2014.
- F-2 LADOT Approval Letter, From Los Angeles Department of Transportation to Los Angeles Department of City Planning, August 22, 2014.
- G-1 Response from Los Angeles Bureau of Sanitation, July 14, 2014.
- G-2 Response from Los Angeles Department of Water and Power, August 18, 2014.
- G-3 Response from Southern California Gas Company July 29, 2014.

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY City of Los Angeles	COUNCIL DISTRICT 4
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PROJECT TITLE ENV-2014-4075-MND	CASE NO. CPC-2014-4074-GPA-ZC-HD-ZAA-SPR
---	--

PROJECT LOCATION
900, 904, 906, 912, 916, 922, 926, 932 N. La Brea Ave. and 7069 Willoughby Ave., Los Angeles, CA 90038

PROJECT DESCRIPTION
The Project Site is located on the northeast corner of N. La Brea Avenue and Willoughby Avenue. The Project Site is rectangular-shaped with commercial uses adjacent to the north, an alley and commercial uses to the east, commercial uses across La Brea Avenue to the west, and retail use to the south across Willoughby Avenue. The Site is approximately ½ block south of the City of West Hollywood border at Romaine Street. The total area that composes the Project site is approximately 50,012.8 square feet (or 1.148 acres). The Project Site is in the Hollywood Community Plan Area, zoned MR1-1 (Restricted Industrial Zone, Height District 1), the General Plan land use designation for the Site is Limited Manufacturing, and the Site is within the Los Angeles State Enterprise Zone (ZI-2374). The Project Site's northern half contains two buildings operating as storage space and the southern half contains vacant land (formerly occupied with retail buildings which were removed). The Project would remove all existing uses and buildings. The Project would be an approximately 150,000 square foot, 7-story (75 feet) mixed-use building with approximately 37,385 square feet of ground-floor retail, and approximately 169 residential apartments on levels 2 through 7. Retail parking would be provided in one subterranean level and residential parking would be provided on levels 2 and 3. The Project will require approval of the following:

Discretionary:

1. A General Plan Amendment to amend the Hollywood Community Plan to re-designate the Project Site from Limited Manufacturing to Neighborhood Commercial;
2. A Vesting Zone Change from MR1-1 to C2-2D;
3. Site Plan Review for a development creating more than 50 dwelling units;
4. A Zoning Administrator's Adjustment to permit a five-foot side yard setback on the northern boundary of the Project Site at the first and second residentially-used levels in lieu of the 9 feet otherwise required; and
5. Haul Route permit to export up to 30,000 cubic yards of materials.

Ministerial:

6. A 35% increase in base density for setting aside 11% of base density for Very Low Income households.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
904 North La Brea (LA) Owner, LLC
6922 Hollywood Blvd, Suite 900
Los Angeles, CA 90028

FINDING:
The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance

(CONTINUED ON PAGE 2)

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt the mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM		TITLE	TELEPHONE NUMBER
JANE CHOI		City Planner	(213) 978-1379
ADDRESS	SIGNATURE (Official)		DATE
200 N. SPRING STREET, 7th FLOOR LOS ANGELES, CA. 90012			02/23/2015

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY
and CHECKLIST
(CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	COUNCIL DISTRICT: 4	DATE: 02/23/2015
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RESPONSIBLE AGENCIES: Department of City Planning

ENVIRONMENTAL CASE: ENV-2014-4075-MND	RELATED CASES: CPC-2014-4074-GPA-ZC-HD-ZAA-SPR
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PREVIOUS ACTIONS CASE NO.:	<input type="checkbox"/> Does have significant changes from previous actions. <input type="checkbox"/> Does NOT have significant changes from previous actions
-----------------------------------	---

PROJECT DESCRIPTION:
DEMOLISH (E) STRUCTURES AND CONSTRUCT A (N) 7-STORY MIXED-USE DEVELOPMENT COMPRISING OF 169 D.U.'S (14 RESERVED FOR VERY LOW INCOME) AND 37,385 SQ FT OF GROUND FLOOR RETAIL

ENV PROJECT DESCRIPTION:

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 5. Haul Route permit to export up to 30,000 cubic yards of materials.

- Ministerial:
6. A 35% increase in base density for setting aside 11% of base density for Very Low Income households.

ENVIRONMENTAL SETTINGS:
See Section 2. Project Description (page 2-1) of this document.

PROJECT LOCATION:
900, 904, 906, 912, 916, 922, 926, 932 N. La Brea Ave. and 7069 Willoughby Ave., Los Angeles, CA 90038

COMMUNITY PLAN AREA: HOLLYWOOD STATUS:	AREA PLANNING COMMISSION: CENTRAL	CERTIFIED NEIGHBORHOOD COUNCIL: CENTRAL HOLLYWOOD
<input type="checkbox"/> Does Conform to Plan		

✓ Does NOT Conform to Plan

EXISTING ZONING:
MR1-1

**MAX. DENSITY/INTENSITY
ALLOWED BY ZONING:**
62 Units/75,019.2 SF

GENERAL PLAN LAND USE:
Limited Manufacturing

**MAX. DENSITY/INTENSITY
ALLOWED BY PLAN
DESIGNATION:**
62 Units/75,019.2 SF

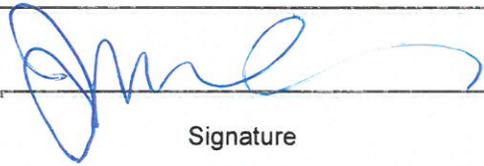
LA River Adjacent:
NO

PROPOSED PROJECT DENSITY:
169 Units

Determination (To Be Completed By Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

City Planner

Title

(213) 978-1379

Phone

Evaluation Of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

Environmental Factors Potentially Affected:

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

<input checked="" type="checkbox"/> AESTHETICS <input type="checkbox"/> AGRICULTURE AND FOREST RESOURCES <input checked="" type="checkbox"/> AIR QUALITY <input type="checkbox"/> BIOLOGICAL RESOURCES <input checked="" type="checkbox"/> CULTURAL RESOURCES <input checked="" type="checkbox"/> GEOLOGY AND SOILS	<input checked="" type="checkbox"/> GREEN HOUSE GAS EMISSIONS <input checked="" type="checkbox"/> HAZARDS AND HAZARDOUS MATERIALS <input checked="" type="checkbox"/> HYDROLOGY AND WATER QUALITY <input checked="" type="checkbox"/> LAND USE AND PLANNING <input type="checkbox"/> MINERAL RESOURCES <input checked="" type="checkbox"/> NOISE	<input type="checkbox"/> POPULATION AND HOUSING <input checked="" type="checkbox"/> PUBLIC SERVICES <input checked="" type="checkbox"/> RECREATION <input checked="" type="checkbox"/> TRANSPORTATION/TRAFFIC <input checked="" type="checkbox"/> UTILITIES AND SERVICE SYSTEMS <input type="checkbox"/> MANDATORY FINDINGS OF SIGNIFICANCE
--	---	--

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

Background

PROPONENT NAME:

904 North La Brea (LA) Owner, LLC

APPLICANT ADDRESS:

6922 Hollywood Blvd, Suite 900
Los Angeles, CA 90028

AGENCY REQUIRING CHECKLIST:

Department of City Planning

PROPOSAL NAME (if Applicable):

904 La Brea Project

PHONE NUMBER:

(213) 481-6569

DATE SUBMITTED:

10/30/2014

ENVIRONMENTAL IMPACTS

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

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project, and the Forest Legacy Assessment project, and forest carbon measurement mythology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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Service?				
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in <i>State CEQA Guidelines</i> §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to <i>State CEQA Guidelines</i> §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. HYDROLOGY AND WATER QUALITY. Would the proposal result in:				
a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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12. NOISE. Would the project:				
a. Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. PUBLIC SERVICES.				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which				

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could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. TRANSPORTATION AND TRAFFIC. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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18. MANDATORY FINDINGS OF SIGNIFICANCE.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Does the project have impacts which are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |



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

PREPARED BY	TITLE	TELEPHONE #	DATE
Jane Choi	City Planner, Expedited Processing	(213) 978-1379	

List of Mitigation Measures

1. Aesthetics

1-1 Aesthetics (Vandalism)

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Municipal Code Section 91.8104.15.

1-2 Aesthetics (Signage on Construction Barriers)

- The applicant shall affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: "POST NO BILLS".
- Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence. Authorized signage shall be allowed.

1-3 Aesthetics (Landscape Plan)

All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a Landscape Practitioner (Sec. 12.40-D)

1-4 Aesthetics (Light)

Outdoor lighting shall be designed and installed with shielding, such that the light sources cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

1-5 Aesthetics (Glare)

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

2. Agriculture And Forestry Resources

No mitigation measures required.

3. Air Quality

- 3-1 During site preparation and grading, the unpaved portions of the site shall be watered at least three times daily to reduce PM₁₀ and PM_{2.5} emissions.
- 3-2 Ground cover shall be replaced and/or installed as soon as practical to reduce fugitive PM₁₀ and PM_{2.5} emissions.
- 3-3 Tracking of dirt and mud from the Project Site onto local streets shall be minimized through use of truck wheel washers or equivalent measures.
- 3-4 All diesel-fueled off-road construction equipment used in the grading and construction phases shall have Level 2 or 3 diesel particulate filters installed that are certified by the California Air Resources Board to reduce PM₁₀ and PM_{2.5} emissions.
- 3-5 All diesel-fueled off-road construction equipment used in the grading and construction phases shall have Tier 3 or 4 engines that are certified by the U.S. EPA installed to reduce NO_x emissions.

4. Biological Resources

No mitigation measures required.

5. Cultural Resources

5-1 Cultural Resources (Archaeology)

- If any archaeological materials are encountered during the course of project development, all further development activity shall halt in the areas of archaeological sensitivity (excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent archaeological resources), and:
 - a. The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Register of Professional Archaeologists (ROPA) or a ROPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
 - b. The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
 - c. The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

SCCIC Department of Anthropology
McCarthy Hall 477 CSU Fullerton
800 North State College Boulevard
Fullerton, CA 92834

- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

5-2 Cultural Resources (Paleontology)

- If any paleontological materials are encountered during the course of project development, all further development activities shall halt in the areas of paleontological sensitivity (excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent paleontological resources), and:
 - a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
 - b. The paleontologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
 - c. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report.
 - d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
 - e. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

5-3 Cultural Resources (Human Remains)

- In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
 - a. Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
 - b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.
 - c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
 - d. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

- e. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or;
- f. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

6. Geology and Soils

6-1 Erosion/Grading/Short-Term Construction Impacts

- The applicant shall provide staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:
 - a. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
 - b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.

6-2 The Project shall comply with the recommendations contained within the geotechnical Engineering Report submitted to the Department of Building and Safety.

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

7. Greenhouse Gas Emissions

7-1 Greenhouse Gas Emissions

Only low- and non-VOC-containing paints, sealants, adhesives, and solvents shall be utilized in the construction of the project.

8. Hazards and Hazardous Materials

8-1 Lead Based Paint

- Prior to demolition activities, a review of building components known to contain lead-based paint shall be assessed to confirm if they remain intact. If the lead-based painted components will be removed, waste characterization testing shall be performed to determine if the components are required to be disposed of as hazardous waste.

- If the waste characterization indicates that any components are not hazardous waste, these components may be disposed of as construction debris as long as the paint is maintained in good and tightly adhered condition. However, if the demolition or renovation activities require sanding, grinding, or torch cutting of these paints, then the lead-based paint is required to be removed prior to these activities.
- All contractors shall be informed of all locations of lead-based paint, whether in good or poor condition, prior to the start of any work within the interior or exterior of the building.

8-2 Explosion/Release (Polychlorinated Biphenyl)

- Prior to demolition activities, a polychlorinated biphenyl (PCB) abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.

8-3 Radon

- Prior to demolition activities, specific testing would be required to evaluate any risk from radon. If radon is tested above the threshold, it shall be made compliant with federal, state, and local regulations for radon.

8-4 Mold

- Prior to demolition activities, a mold inspection contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing mold removal and disposal.

8-5 Chemicals of Potential Concern

- Site grading shall be conducted under a Soils Management Plan that includes appropriate segregation and management of soils impacted with chemicals of potential concern (COPCs) so as to minimize delays and protect site workers, neighbors and the environment.
- Any modification of onsite groundwater monitoring wells on the 926/932 La Brea Avenue portion associated with the upgradient Mole Richardson SLIC case shall be coordinated with Mole Richardson and the LARWQCB.
- An assessment of exposure pathways such as direct contact and vapor inhalation is recommended to evaluate the impact of soil, soil gas and groundwater COPCs to current and potential future site occupants.

8-6 Methane

The Project shall comply with the Mitigation Requirements for Methane Buffer Zone Level V, established in Table 1-B of Methane Test Data, GeoKinetics, October 6, 2014. This includes:

- Passive System
 - Dewatering System
 - Perforated Horizontal Pipes

- 4-inch Gravel Blanket Thickness Under Impervious Membrane
- 4-inch Gravel Thickness Surrounding Perforated Horizontal Piles
- Vent Risers
- Impervious Membrane
- Active System
 - Mechanical Extraction System capable of providing an equivalent of a complete change of air 20 minutes of the total volume of the Gravel Blanket.
 - Gas Detection System
 - Alarm System
 - Control Pad
- Miscellaneous System
 - Trench Dam
 - Conduit or Cable Seat Fitting
 - Additional Vent Risers (the total quantity of the installed vent risers shall be increased to twice the rate for the Passive System.

8-7 Emergency Evacuation Plan

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

9. Hydrology and Water Quality

9-1 Construction Dewatering

- Dewatering shall be performed by the installation of wells on the Project Site and withdrawing water prior to reaching the subgrade elevation. Dewatering shall be required to remove water from the footing excavations and reduce the potential for pumping subgrade soils.

Permanent Dewatering

- The subterranean level shall be designed for potential hydrostatic and buoyancy pressure. The structure may instead be designed with a permanent dewatering system. The subterranean portion of the building shall be designed with drainage devices to relieve hydrostatic pressure. These devices include drains outside the retaining walls as well as drainage below the proposed slab.

- An underslab drainage system installed below the subterranean garage floor slab shall consist of 1-foot thick layer of gravel underlying the entire floor slab, and subdrain pipes placed in gravel-filled drainage trenches leading to a sump pump. The drain lines shall consist of 4-inch perforated pipe, perforations down, placed in trenches approximately 1 foot wide and 1 foot in depth below the bottom of the gravel blanket. The pipes shall then be covered with gravel and the entire gravel and pipe system within the trenches would be wrapped in filter fabric. The gravel filled drainage trenches are typically spaced on approximately 40-foot centers, although there is flexibility in the spacing, depending on the column grid line spacing.

9-2 Site Drainage

- All Site drainage, with the exception of any required to be disposed of onsite by stormwater regulations, shall be collected and transferred to the street in non-erosive drainage devices.
- The proposed structure shall be provided with roof drainage.
- Discharge from downspouts, roof drains, and scuppers shall not be permitted on unprotected soils within five feet of the building perimeter. Drainage shall not be allowed to pond anywhere on the Project Site, and especially not against any foundation or retaining wall.
- Drainage shall not be allowed to flow uncontrolled over any descending slope.
- Planters which are located within a distance equal to the depth of a retaining wall shall be sealed to prevent moisture adversely affecting the wall. Planters which are located within five feet of the foundation shall be sealed to prevent moisture affecting the earth materials supporting the foundation.

9-3 Stormwater Pollution (Demolition, Grading, and Construction Activities)

- 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.
- 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.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

10. Land Use and Planning

- 10-1** An air filtration system shall be installed and maintained with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.

11. Mineral Resources

No mitigation measures required.

12. Noise

12-1 The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

12-2 The construction staging area shall be as far from sensitive receptors as possible.

12-3 The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices capable of attenuating sound by 3 dBA or more.

12-4 Two weeks prior to commencement of construction, notification shall be provided to the off-site residential uses within 500 feet of the Project Site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.

12-5 Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- The walls of the parking garage adjacent to residentially zoned or used properties shall be enclosed.

12-6 The development shall comply with the Noise Insulation Standards of Title 24 of the California Code of Regulations to ensure an acceptable interior noise environment.

12-7 All exterior walls, including exterior windows of proposed residential units, shall be built with construction assemblies having a minimum Sound Transmission Class (STC) 35 for units facing toward La Brea Avenue and a minimum STC 30 for units facing Willoughby Avenue, as needed to meet a 45 dBA (CNEL) level for the interior of residential units.

13. Population and Housing

No mitigation measures required.

14. Public Services

14-1 Fire Flows and Hydrants

The Project shall submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the project area is sufficient. If it is not, then upgrades to the existing infrastructure shall be required.

14-2 Public Services (Fire)

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

14-3 Public Services (Police – Demolition/Construction Sites)

Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

14-4 Public Services (Police)

The plans shall incorporate a design that enhances the security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, and location of toilet facilities or building entrances in high-foot traffic areas. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

14-5 Upon completion of the Project, the Hollywood Area commanding officer shall be provided with a diagram of each portion of the property. The diagram shall include access routes and any additional information that might facilitate police response.

14-6 Recreation (Increased Demand for Parks or Recreational Facilities)

If the applicant seeks a certificate of occupancy for apartments, then the following applies: (*Apartments*) Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

15. Recreation

See Mitigation Measure 14-6

16. Transportation and Traffic

16-1 Safety Hazards

- The developer shall install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety.

- Projects involving the import/export of 20,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety.

17. Utilities and Service Systems

17-1 Wastewater Service

- As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project's wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety.

17-2 Water Service

- As part of the normal construction/building permit process, the Project Applicant shall confirm with the LADWP Water Service Organization (WSO) that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. If the water infrastructure has insufficient capacity, then the Project Applicant shall be required to build water lines to a point in the system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety.

17-3 Utilities (Local Water – Landscaping)

- The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g, use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).
- In addition to the requirements of the Landscape Ordinance, the landscape plan 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 plan materials
 - Use of landscape contouring to minimize precipitation runoff

- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 sf and greater.

17-4 Utilities (Local Water Supplies – All New Construction)

- 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.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

17-5 Utilities (Local Water Supplies – New Commercial or Industrial)

- All restroom faucets shall be of a self-closing design.

17-6 Utilities (Local Water Supplies – New Residential)

- Install no more than one showerhead per shower stall, having a flow rate 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.
- 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.

17-7 Utilities (Solid Waste Recycling – Construction/Demolition)

Prior to the issuance of any construction permit, the Project Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the City of Los Angeles Department of Building and Safety. The construction contractor(s) shall only contract for waste disposal services with a company that recycles construction-related waste.

17-8 Utilities (Solid Waste Recycling)

To facilitate on-site separation and recycling of demolition and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

17-9 Utilities (Solid Waste Disposal)

All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

17-10 Utilities (Solid Waste Recycling - Operational)

Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.

18. Mandatory Findings of Significance

No mitigation measures required.

2. PROJECT DESCRIPTION

Introduction

<u>Project Title:</u>	904 La Brea Project
<u>Project Location:</u>	900, 904, 906, 912, 916, 922, 926, 932 N. La Brea Ave. and 7069 Willoughby Ave., Los Angeles, CA 90038
<u>Lead Agency:</u>	City of Los Angeles Department of City Planning, Expedited Processing 200 N. Spring Street, Room 721, Los Angeles, California 90012
<u>City Staff Contact:</u>	Jane Choi, City Planner (213) 978-1379 jane.choi@lacity.org
<u>Applicant:</u>	904 North La Brea (LA) Owner, LLC 6922 Hollywood Boulevard, 9 th Floor, Los Angeles, CA 90028

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) under the California Environmental Quality Act (CEQA) is the proposed 904 La Brea Project (the Project), which consists of a new residential and retail development.

CEQA Statutes and Guidelines

According to CEQA Statute § 21064.5:

MITIGATED NEGATIVE DECLARATION

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

According to CEQA Guidelines, Article 6. Negative Declaration Process

15070. DECISION TO PREPARE A NEGATIVE OR MITIGATED NEGATIVE DECLARATION

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

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

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

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

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

15071. CONTENTS

A Negative Declaration circulated for public review shall include:

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

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

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

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

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

Project Location

The Project Site is located at 900, 904, 906, 912, 916, 922, 926, 932 N. La Brea Ave. and 7069 Willoughby Ave., Los Angeles, CA 90038. The Project Site is located on the northeast corner of N. La Brea Avenue and Willoughby Avenue. The Project Site is rectangular-shaped with commercial uses adjacent to the north, an alley and primarily commercial uses to the east, primarily commercial uses across La Brea Avenue to the west, and retail use to the south across Willoughby Avenue. The Project Site is approximately ½ block south of the City of West Hollywood border at Romaine Street. See Figure 2-1, Regional and Local Vicinity Map, for the location within the context of the City. See Figure 2-2, Aerial Map, for the Project Site and surrounding areas.

Regional Setting

The Project Site is located within the Hollywood Community Plan (HCP) in the City of Los Angeles (City), approximately six miles northwest of Downtown Los Angeles. The HCP is a mosaic of districts, including the historic entertainment district on Hollywood Boulevard, the Media District south of Santa Monica Boulevard, the major medical facility cluster in East Hollywood, and many distinctive residential neighborhoods throughout. The HCP covers 25 square miles, extending roughly south of Mulholland Drive and the Cities of Burbank and Glendale and the Ventura Freeway (US-134); west of the Golden State Freeway (I-5); north of Melrose Avenue; and east of the Cities of West Hollywood and Beverly Hills, including a strip of land south of the City of West Hollywood and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue. Adjoining community plan areas include Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass to the north, Bel Air-Beverly Crest to the west, Wilshire to the south, and Silver Lake-Echo Park and Northeast Los Angeles to the east.

Regional and Local Access

Regional access is provided by the Hollywood Freeway (US-101) located approximately 1.75 miles northeast of the Project Site at Highland Avenue and approximately 2.1 miles east at Santa Monica Boulevard/Western Avenue. Local access is provided by La Brea Avenue, Santa Monica Boulevard, and Melrose Avenue.

Public Transit

The Los Angeles County Metropolitan Transportation Authority (Metro) provides bus service to the Project Site. La Brea Avenue carries bus lines 212/312 at the corner of La Brea and Willoughby. Both the General Plan Framework Element and the Transportation Element designate a Brea Avenue as a Future Transit Priority Highway.¹ Santa Monica Boulevard, within 1,000 feet of the Project, carries bus lines 4 and the Rapid 704, as well as the West Hollywood Cityline route. The Metro Red Line provides rail service to Downtown Los Angeles, Koreatown, Hollywood, and North Hollywood. The Project Site is approximately one mile southwest of the Metro's Hollywood/Highland Station.

Site Characteristics

The Project Site is rectangular-shaped. The Project Site's assessor parcel number (APN), zoning, land use designation, and lot size is listed on Table 2-1, Project Site. The total area that composes the Project site is approximately 50,012.8 square feet (or 1.148 acres).² The Project Site is in the Hollywood Community

¹ Framework Element, Figure 8-2 and Transportation Element, Map B-2.

² ZIMAS lists the Project Site area as 50,012.8 square feet. An ALTA/ACSM survey lists the Project Site area as 50,002 square feet. The Site Plan utilizes an area of 49,340 which accounts for dedications. The analyses use the largest area as listed by ZIMAS. It would allow an additional unit of base density. The difference is dedications.

Plan area, zoned MR1-1 (Restricted Industrial Zone, Height District 1), the General Plan land use designation for the Project Site is Limited Manufacturing, and the Project Site is within the Los Angeles State Enterprise Zone (ZI-2374), and ZI-2433 Hollywood Community Plan Injunction.³

Until recently, the Project Site was subject to the Hollywood Community Plan Update (HCP Update), which was adopted by City Council on June 19, 2012 (and its associated zoning ordinance as Ordinance No. 182,173).⁴ On December 10, 2013, the Superior Court of California issued a tentative ruling that the HCP Update and accompanying EIR were not legally adequate and should be invalidated.⁵ On February 11, 2014, the court ordered a preemptory writ of mandate that the City take the necessary steps to rescind, vacate, and set aside all actions approving the HCP Update, the certified EIR and any and all actions that derive from the HCP Update. The court also enjoined the City from granting any authority, permits or entitlements that derive from the HCP Update or the EIR. On April 2, the City Council adopted a resolution to rescind the HCP Update and adopted Ordinance No. 182960 to repeal the associated zoning ordinance all to comply with the court's order. Therefore, the HCP Update and the associated zoning ordinance have been repealed, rescinded and invalidated. By operation of law, the 1988 Community Plan (See City Council action CF 12-0303 S4), in conjunction with the applicable provisions of the Los Angeles Municipal Code (LAMC) guide the land use and zoning on the Project Site, respectively.

Existing Uses

The Project Site's northern half contains two buildings operating as 16,255 square feet (6,740 square feet and 9,515 square feet) of storage space with minor ancillary support office. The Project Site's southern half contains vacant land. The Project would remove all existing uses and buildings. The existing Project Site is shown in Figures 2-3 through 2-5, Views of the Project Site.

Surrounding Uses

- To the west across La Brea Avenue are the following uses: 4-story office building; vacant land (to be developed with a retail and office building); and the under-construction La Brea Gateway Project (containing commercial use and dwelling units).

The pre-dedication lot area is 50,002 sf by survey and 50,012 by ZIMAS. After dedicating 2 feet on La Brea, the Site is reduced by 672.8 sf.

³ ZI-2433 became effective on April 2, 2014 in response to the LA County Superior Court's injunction prohibiting the City from granting any authority, permits, or entitlements which derive from the HCP Update or its EIR. <http://zimas.lacity.org/documents/zoneinfo/ZI2433.pdf>

⁴ Hollywood Community Plan Update: <http://cityplanning.lacity.org/complan/pdf/HwdCpTxt.pdf>

⁵ Superior Court Judge Allan J. Goodman, December 10, 2013. Case Nos. BS138580, BS138169, and BS138370.

- To the south across Willoughby Avenue is a commercial retail use (operated as a 99 Cents Only Store) and surface parking lot to the rear.
- To the north by an adjacent 3-story (with rear setback 5-story portion) retail and office building.
- To the east separated by an alleyway are 1-story commercial and industrial warehouse/storage buildings.

The nearest existing residential uses are to the southeast, at Willoughby Avenue and Sycamore Avenue. The under construction La Brea Gateway project would include residential uses across La Brea Avenue to the west. The surrounding uses are shown in Figures 2-6 and 2-7, Views of the Surrounding Uses.

**Table 2-1
Project Site**

Address	APN	Zone	General Plan Land Use	Size (sf)
900 N. La Brea Avenue; 7069 W. Willoughby Avenue	5531-015-001	MR1-1	Limited Manufacturing	7,070.8
904, 906 N. La Brea Avenue				7,157.0
912 N. La Brea Avenue				7,157.0
916 N. La Brea Avenue				7,157.0
922 N. La Brea Avenue	5531-015-002			7,157.0
None				3,578.5
926 N. La Brea Avenue	5531-015-003			3,578.5
932 N. La Brea Avenue				7,157.0
Total				50,012.8
<i>Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org/. Table by CAJA Environmental Services, May 2014.</i>				

Proposed Project

The Project would develop a building with approximately 150,000 square feet of Floor Area as measured by the Los Angeles Municipal Code.⁶ The building would contain 169 dwelling units and approximately 37,385 square feet of retail⁷ and reach 7-stories, approximately 75 feet in height. Parking would be

⁶ Los Angeles Municipal Code Section 12.03 defines Floor Area to exclude the following: “exterior walls, stairways, shafts, rooms housing Building-operating equipment or machinery, parking areas with associated driveways or ramps, space dedicated to bicycle parking, space for the landing and storage of helicopters, and Basement storage areas.”

⁷ The Traffic study analyzed a larger envelope of 40,000 square feet of retail. Thus, the 37,385 sf retail falls within that larger envelope of impacts. The Project, retail component would be at most 37,385 sf as analyzed throughout this IS/MND.

provided in one subterranean and two above ground levels. A site plan and building plans for each level are shown in Figures 2-8 through 2-15. Elevations and section are shown in Figures 2-16 through 2-18. Rendering views of the front of the building along La Brea are shown in Figures 2-19 and 2-20.

Residential

The 169 dwelling units would include 84 studio units, 78 1-bedroom loft units, and seven 2-bedroom units. The residential units themselves would total approximately 107,000 square feet of Floor Area as defined in the LAMC. The dwelling units would be located on levels 2 through 7. Approximately 14 dwelling units will be reserved for households of Very Low Income as defined in LAMC Section 12.22.A.25(b).

Retail

The Project would include approximately 37,385 square feet of Floor Area used for ground floor retail.

FAR and Density

The Project Site is approximately 50,012.8 square feet and the Project would be approximately 150,038 square feet for a Floor Area Ratio (FAR) of 3:1. The Project proposes a zone change to C2 which permits a residential density of one unit per 400 square feet of lot area. Thus, the Project Site could support 125 dwelling units. The Project is seeking a 35% density bonus (44 units) for a total of 169 units.

Access

Vehicle access for the Project's retail component will be from a two way driveway off of La Brea Avenue near the north end of the Project Site. Vehicle access for the Project's residential component will be from a two way driveway off the alley along the eastern boundary of the Project Site. On-site loading is proposed off of the alley along the eastern boundary of the Project Site. Pedestrian access would be provided on La Brea Avenue, Willoughby Avenue, and the alley (emergency access for pedestrians).

Parking

Table 2-2, Vehicle Parking, provides the amount of required parking by land use type and quantity. Pursuant to the Los Angeles Municipal Code (LAMC), the Project's mix of uses is required to provide 290 spaces. The Project will provide 303 spaces on levels B1, 2, and 3. A basement level of parking will provide 111 spaces for the use of the retail tenants. The residential parking will be provided on two levels (L2 and L3) above the ground floor retail with 192 parking spaces. The residential lobbies, bicycle storage areas, and loft units would shield the parking on levels 2 and 3 around the La Brea and Willoughby sides.

**Table 2-2
Vehicle Parking**

Use	Amount	Rate	Total spaces
Required			
Studio	84 units	1 per unit	84
1-Bedroom	78 units	1.5 per unit	117
2-Bedroom	7 units	2 per unit	14
Subtotal			215
Retail	37,385 sf	2 per 1,000 sf	75
Total			290
Proposed			
Level B1	Retail		111
Levels 2 and 3	Residential		192
Total			303
<i>Source: Shubin + Donaldson, Architects, October 29, 2014. Table by CAJA Environmental Services, October 2014.</i>			

Bicycles

LAMC 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. Commercial uses (retail stores) require one short term and one long term bicycle space per 2,000 square feet of Floor Area. Multi-family residential requires one long term bicycle parking space per unit and one short term bicycle parking space per 10 units. Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. As required and demonstrated below in Table 2-3, the Project will provide, at a minimum, 36 short term and 188 long term bicycle spaces. If the Project is reduced, the corresponding bicycle amenities may be reduced to meet code requirements. Bicycle parking would be provided on levels 1, 2, and 3.

**Table 2-3
Bicycle Parking Required**

Use	Amount	Rate	Short-Term	Long-Term
Commercial				
Retail	37,385 sf	1 per 2,000 sf (short-term) 1 per 2,000 sf (long-term)	19	19
Apartment	169 units	1 per 10 units (short-term) 1 per unit (long-term)	17	169
Total			36	188
<i>Source: Table 11, Traffic Impact Study, Overland Traffic, July 2014. Table by CAJA Environmental Services, October 2014.</i>				

Amenities and Open Space

Table 2-4, Open Space Required, provides the amount of required open space. The Project would provide at least the code-required open space of 19,375 square feet. The Project provides 19,495 square feet. This would be included on Level 4 with a pool, gym, and outdoor deck, and Level 7 deck, and private balconies.

**Table 2-4
Open Space Required**

Use	Amount	Rate	Total size
Required			
Studio	84 units	100 sf / unit	8,400
1-Bedroom	78 units	125 sf / unit	9,750
2-Bedroom	7 units	175 sf / unit	1,225
Total			19,375
<i>Source: Shubin + Donaldson, Architects, October 29, 2014.</i>			
<i>Table by CAJA Environmental Services, October 2014.</i>			

Landscaping

There are two street trees on the City sidewalk along La Brea Avenue, in front of the vacant land on the southern half of the Site. These are off-site street trees as part of the City’s planting program and not natural to the location. There are ornamental plants and sidewalk grass strips in front of the 932 La Brea building.

Green/Conservation Features

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen).⁸

Construction Information

The estimated construction schedule is shown in Table 2-5, Construction Schedule. Operation would begin in 2018.⁹ Demolition will remove approximately 16,255 square feet in two existing buildings. There will be no materials imported to the Site. The amount of materials exported will be up to 30,000

⁸ Los Angeles Department of Building and Safety: <http://ladbs.org/LADBSWeb/green-bldg.jsf>

⁹ Page i, Traffic Impact Study, Overland Traffic, July 2014.

cubic yards.¹⁰ The Project will contain one subterranean level (approximately 8 feet below grade) in addition to any other excavation typically required for foundation and utility work.

**Table 2-5
Construction Schedule**

Phase	Duration
Demolition	1 month
Site Prep	2 weeks
Grading	4-6 weeks
Core/shell Construction	18 months (1 year, 6 months)
Tenant Improvements and Interior Finishes to Residential	2 months
<i>Construction schedule, including start, end, and duration dates are estimates only. Estimates provided by the Applicant, September 8, 2014. Table: CAJA Environmental Services, September 2014.</i>	

Haul Route

A Haul Route program will be required as part of the City’s permitting process (and included as **Mitigation Measure 16-1**). It is anticipated that the limited demolition and construction debris will be transported to the Sunshine Canyon Landfill in Sylmar. As shown in Figure 2-21, Haul Route Map, the estimated haul route is approximately 20 miles and will generally include:

- Local streets (La Brea, Santa Monica, Highland) to US-101 freeway to CA-170 freeway to I-5 freeway to Sepulveda Blvd to San Fernando Road to Sunshine Canyon Landfill.

Project Objectives

The objectives of the Project are as follows:

- Capitalize on a smart growth opportunity by intensifying a currently under-utilized site with a mix of residential and retail uses in an area of the City lacking in mixed use projects.
- Provide retail uses within walking distance of the dense residential neighborhood to the south of Willoughby Avenue and north of Santa Monica Boulevard.
- Provide residential uses within walking distance of the commercial uses along La Brea Avenue, especially the West Hollywood Gateway development.

¹⁰ Estimates provided by the Applicant, September 8, 2014.

- Activate the stretch of La Brea Boulevard between the under-construction La Brea Gateway and the West Hollywood Gateway with new contemporary residential and retail opportunities.
- Improve the aesthetic quality and sustainability of the Project Site by removing older, out-dated structures and vacant land and developing a modern, efficient building that utilizes the latest City and State Green Building Codes.
- Contribute to the economic recovery of the City by developing ground floor retail and residential uses that generate local tax revenues, provide new jobs, with employees and residents who support local businesses, including dining, shopping and entertainment venues nearby.
- Create an architecturally-inspired development that is economically sustainable, compatible with surrounding land uses, and consistent with the policies and objectives of the Hollywood Community Plan.

Discretionary and Ministerial Actions

The City of Los Angeles (the City) is the Lead Agency for the Project. In order to construct the Project, the applicant is requesting approval of the following actions from the City:¹¹

Discretionary Actions

1. A General Plan Amendment to amend the Hollywood Community Plan to re-designate the Project Site from Limited Manufacturing to Neighborhood Commercial;
2. A Vesting Zone Change from MR1-1 to C2-2D;
3. Site Plan Review for a development creating more than 50 dwelling units;
4. A Zoning Administrator's Adjustment to permit a five-foot side yard setback on the northern boundary of the Project Site at the first and second residentially-used levels in lieu of the 9 feet otherwise required; and
5. Haul Route permit to export up to 30,000 cubic yards of materials.

¹¹ Michael Gonzales, Project representation, October 5, 2014.

Ministerial Action

6. A 35% increase in base density for setting aside 11% of base density for Very Low Income households.¹²

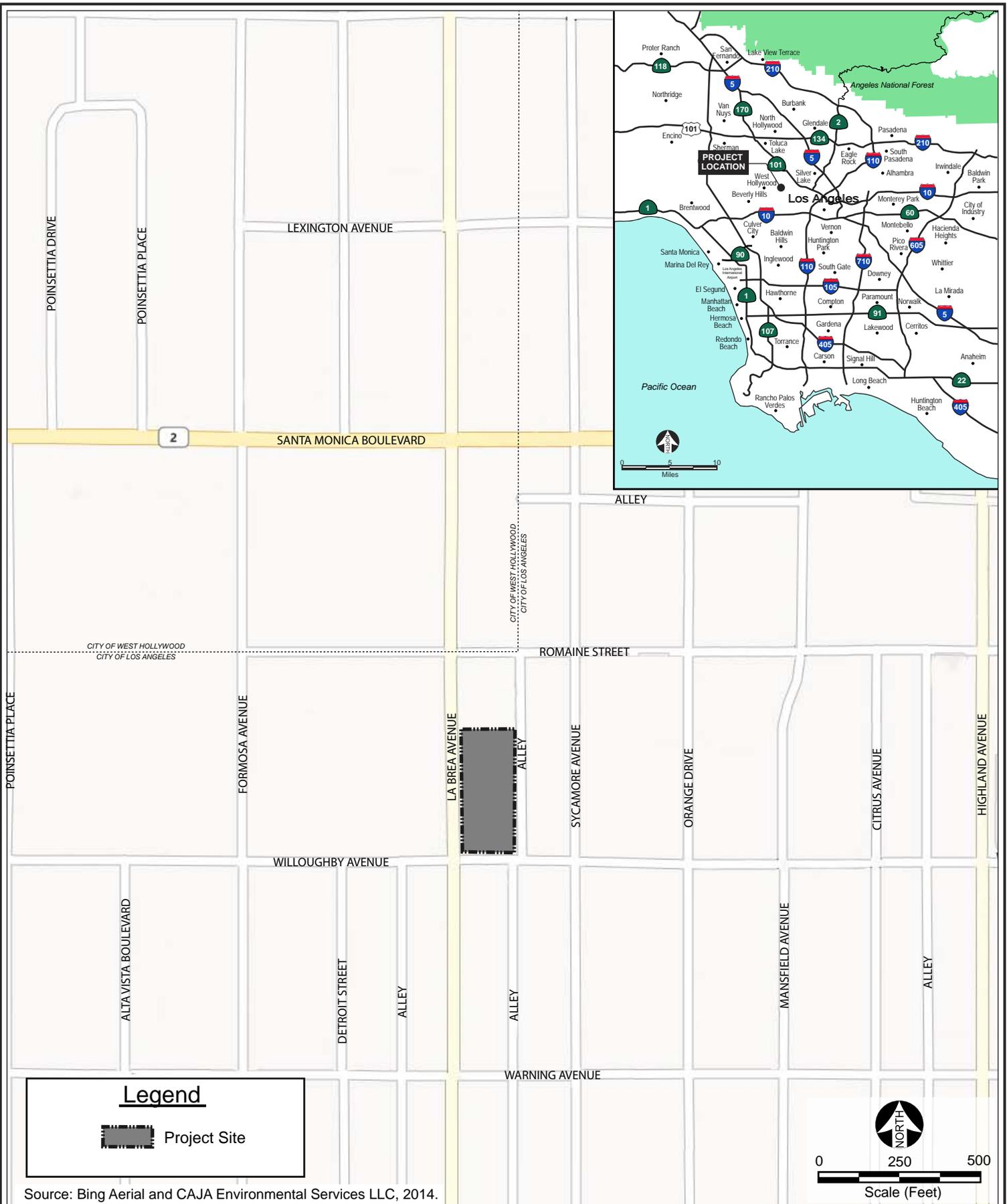
Pursuant to the State's Affordable Housing Density Bonus law¹³ and the City's implementing Density Bonus Ordinance, the Project will set aside 11% of its base density for Very Low Income households, earning a 35% increase in by-right density. The Project will be eligible for, but will not utilize, two on-menu incentives.

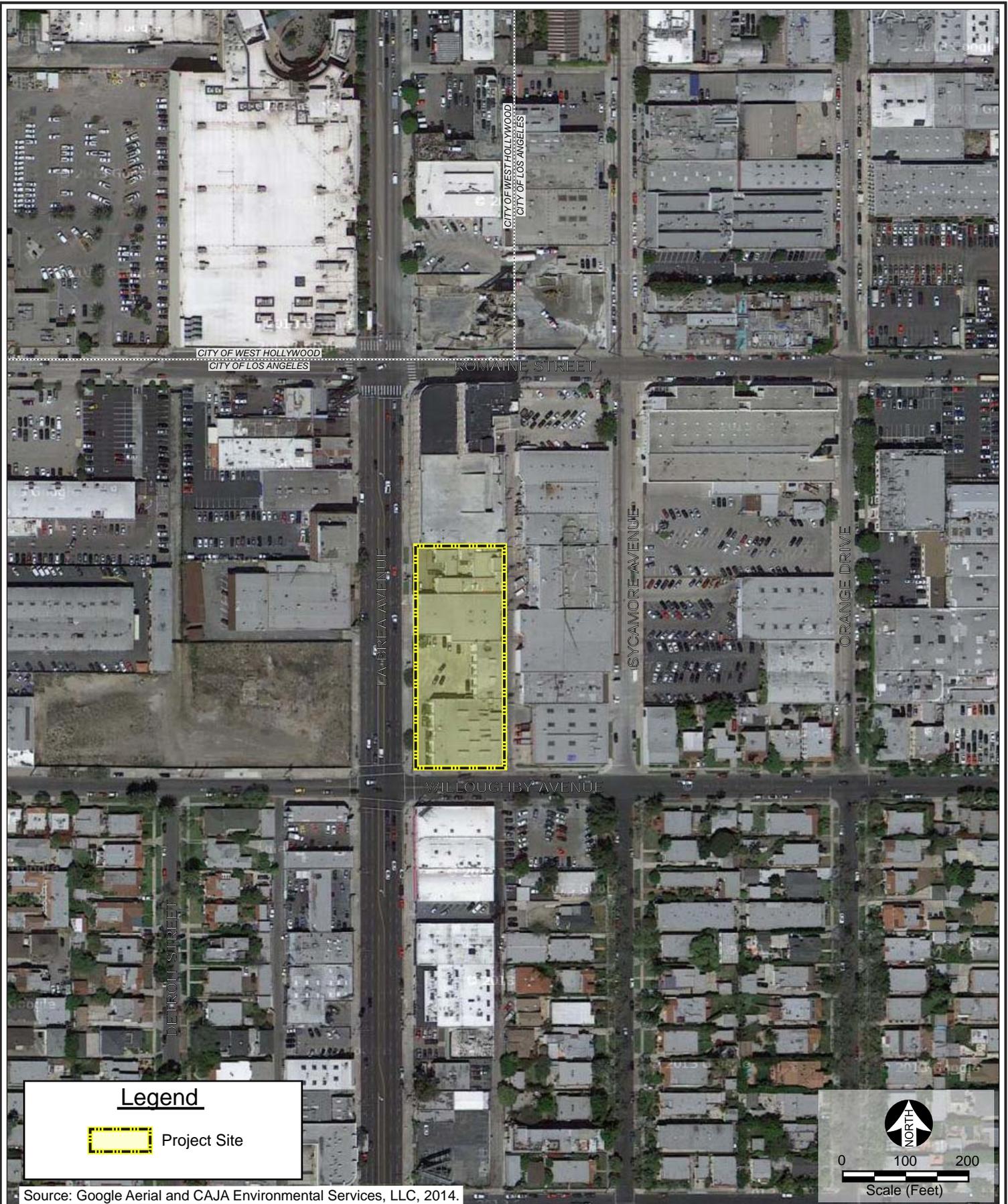
Pursuant to various sections of the Los Angeles Municipal Code, the applicant would request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction activities including, but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, building and tenant improvements. This IS/MND is intended to be the primary reference document in the formulation and implementation of a mitigation monitoring program for the Project. This IS/MND also intended to cover all federal, State, regional and/or local government discretionary approvals that may be required to develop the Project, whether or not they are explicitly listed above. Agencies that may have jurisdiction over the Project include, but are not limited to:

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

¹² LAMC Section 12.22.A.25(g)(1) provides that Density Bonus projects not requesting incentives shall be considered ministerial and do not require a separate application or entitlement.

¹³ California Government Code Section 65915 et seq.





Legend

 Project Site

Source: Google Aerial and CAJA Environmental Services, LLC, 2014.



View 1: Looking northeast from corner of La Brea Avenue and Willoughby Avenue toward southwest corner of the Site.



View 2: Looking northeast across Willoughby Avenue toward southern boundary of the Site.



View 3: Looking east across La Brea Avenue toward southwest corner of the Site.



View 4: Looking east across La Brea Avenue toward west boundary of the Site.



View 5: Looking northeast across La Brea Avenue toward west boundary of the Site.



View 6: Looking east across La Brea Avenue toward west boundary of the Site.

Source: CAJA Environmental Services LLC, 2014.



View 7: Looking northeast across La Brea Avenue toward 922 La Brea building on the Site.



View 8: Looking east across La Brea Avenue toward 922 La Brea building and vacant land on the Site.



View 9: Looking east across La Brea Avenue toward 922 La Brea building on the Site.



View 10: Looking east across La Brea Avenue toward 932 La Brea building on the Site.



View 11: Looking southeast across La Brea Avenue toward 922 and 932 La Brea buildings on the Site.



View 12: Looking southeast across La Brea Avenue toward west boundary of the Site.

Source: CAJA Environmental Services LLC, 2014.



View 13: Looking southwest from rear alley toward vacant portion of the Site.



View 14: Looking northwest from rear alley toward rear of 922 La Brea building on the Site.



View 15: Looking northwest from rear alley toward vacant land and side of 922 La Brea building on the Site.



View 16: Looking north from rear alley toward vacant land and side of 922 La Brea building on the Site.



View 17: Looking north from sidewalk along La Brea Avenue. The Project Site is on the right behind the fence.



View 18: Looking south from sidewalk along La Brea Avenue. The Project Site is on the left behind the fence.

Source: CAJA Environmental Services LLC, 2014.



View 1: Looking south from corner of Willoughby Avenue and Sycamore Avenue toward residential area.



View 2: Looking southeast from corner of Willoughby Avenue and Sycamore Avenue toward residential area.



View 3: Looking north along Sycamore Avenue toward industrial warehouse uses.



View 4: Looking south across Willoughby Avenue toward parking lot for 99 Cents Only Store.



View 5: Looking northeast from rear alley toward adjacent industrial warehouse uses.



View 6: Looking north from rear alley. The Site is on the left.

Source: CAJA Environmental Services LLC, 2014.



View 7: Looking southwest across Willoughby Avenue toward 99 Cent Only Store south of the Site.



View 8: Looking northwest from corner of Willoughby Avenue and La Brea Avenue. The Site is on the right.



View 9: Looking northwest from La Brea Avenue and Willoughby Avenue toward under construction La Brea Gateway project site.



View 10: Looking south along La Brea Avenue along the under construction La Brea Gateway project site.

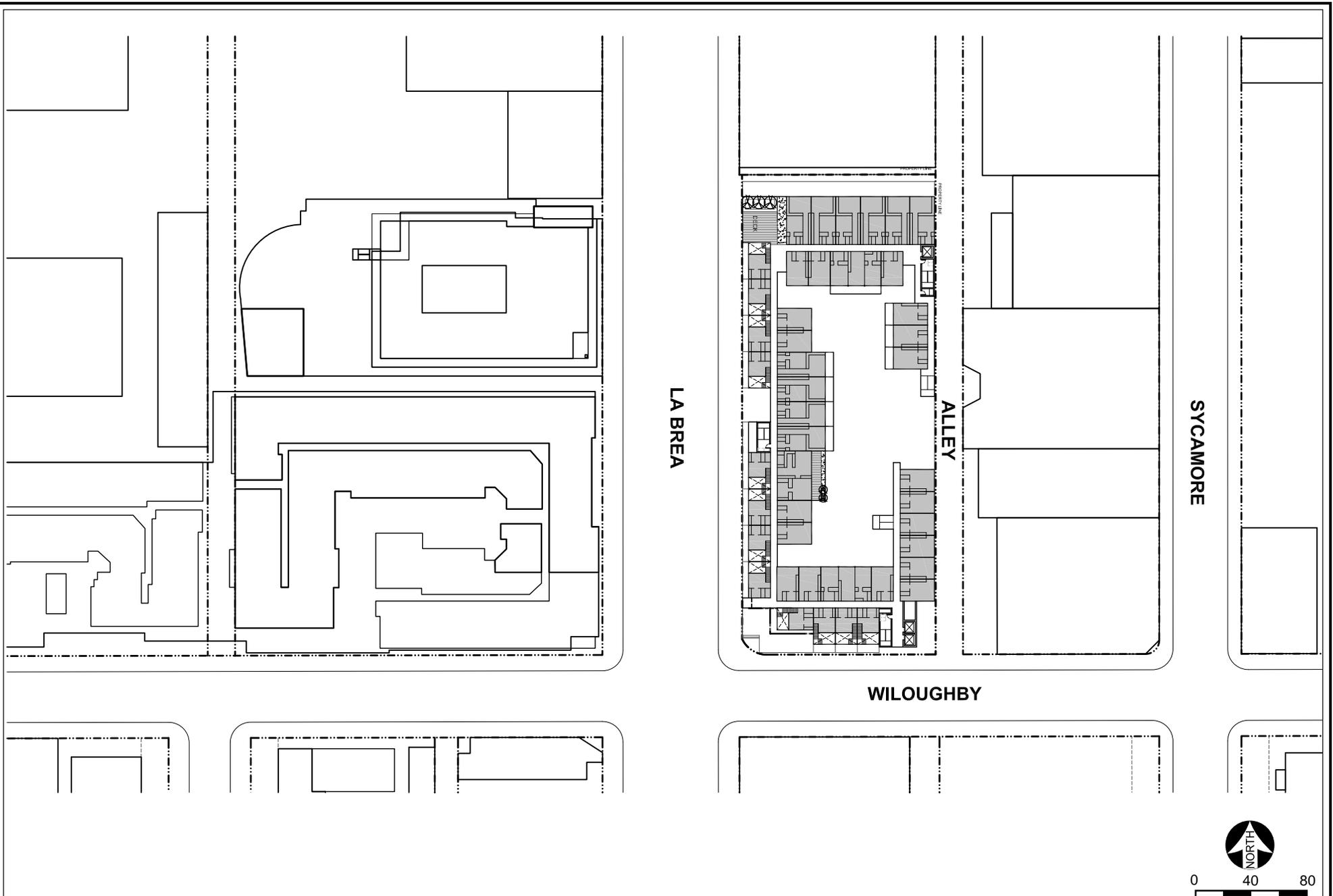


View 11: Looking east across La Brea Avenue toward adjacent retail and office building to the north of the Site.

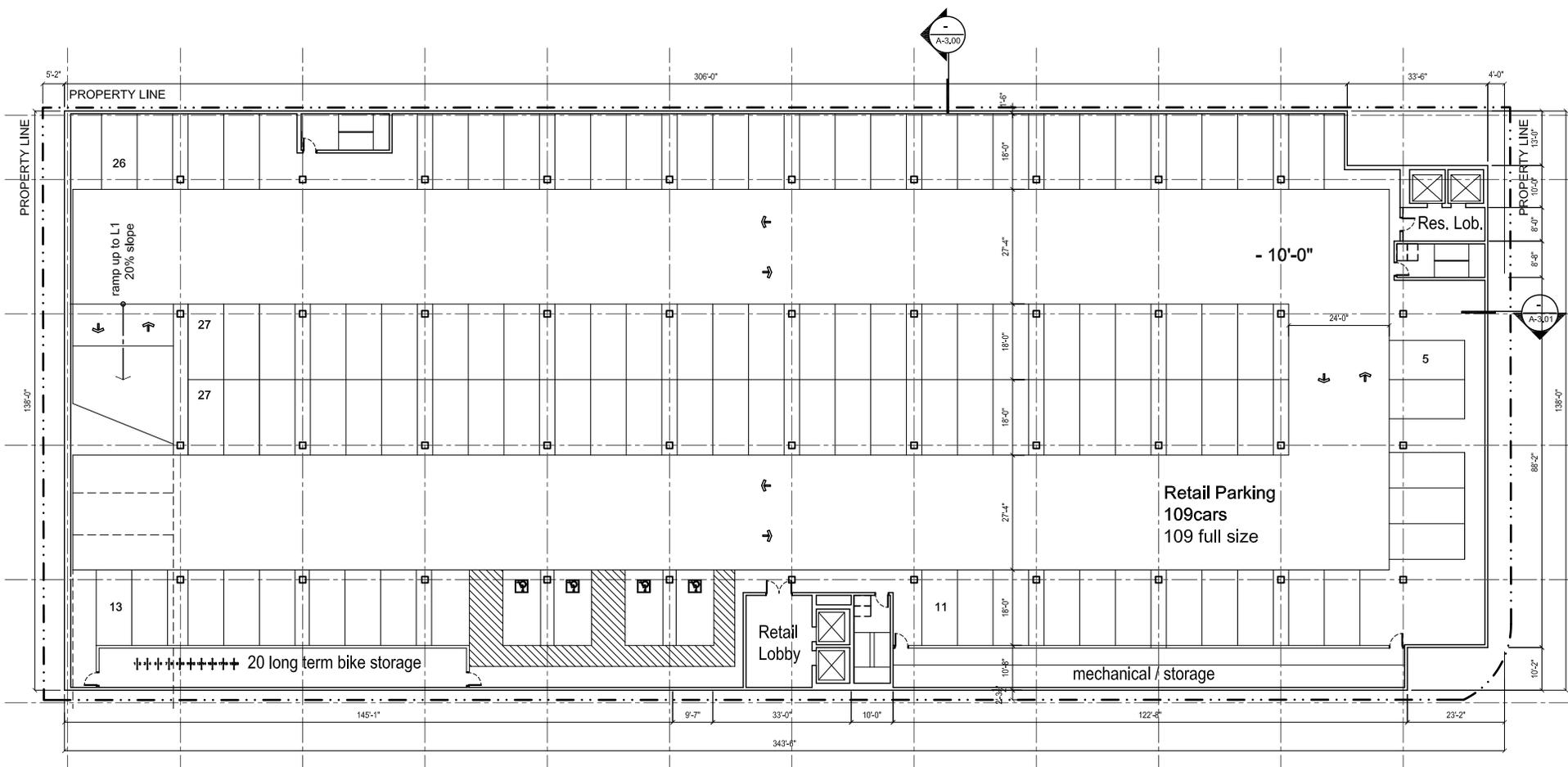


View 12: Looking northeast across La Brea Avenue toward adjacent retail and office building to the north of the Site.

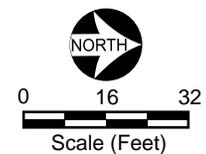
Source: CAJA Environmental Services LLC, 2014.

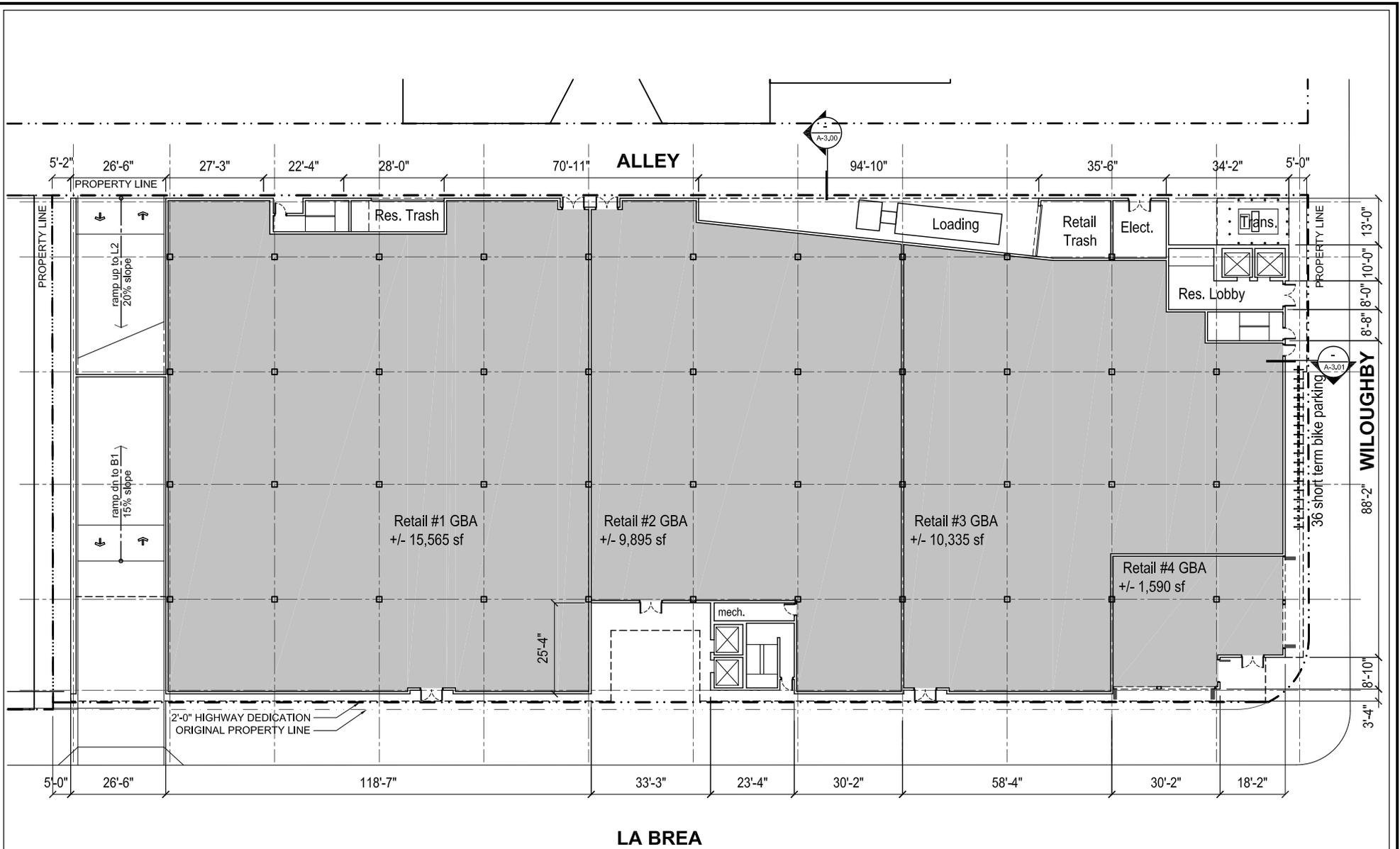


Source: Shubin + Donaldson Architects Inc., 10/29/14.

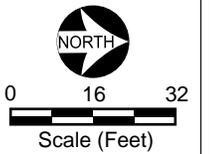


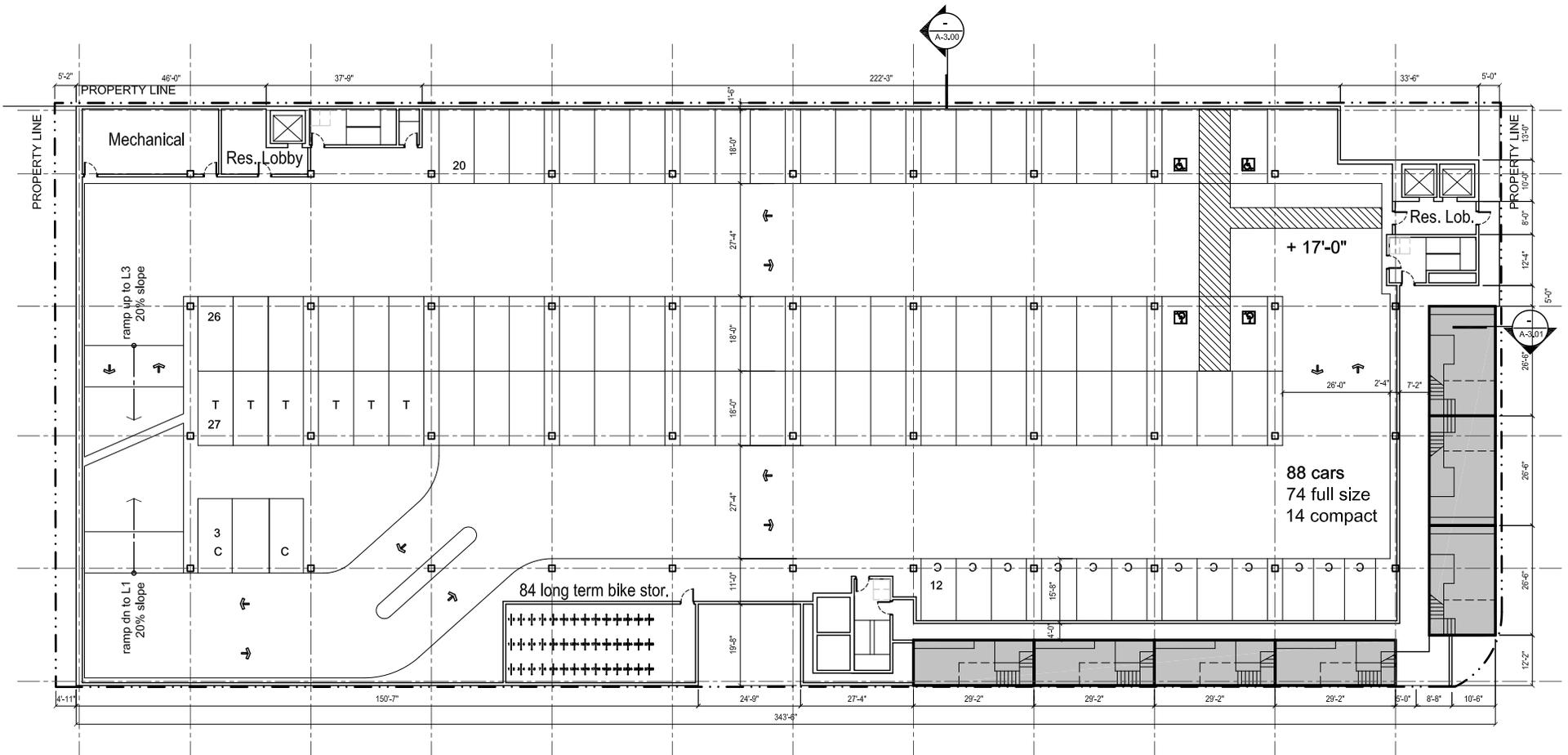
Source: Shubin + Donaldson Architects Inc., 10/29/14.



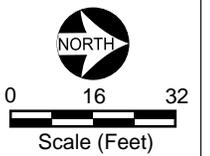


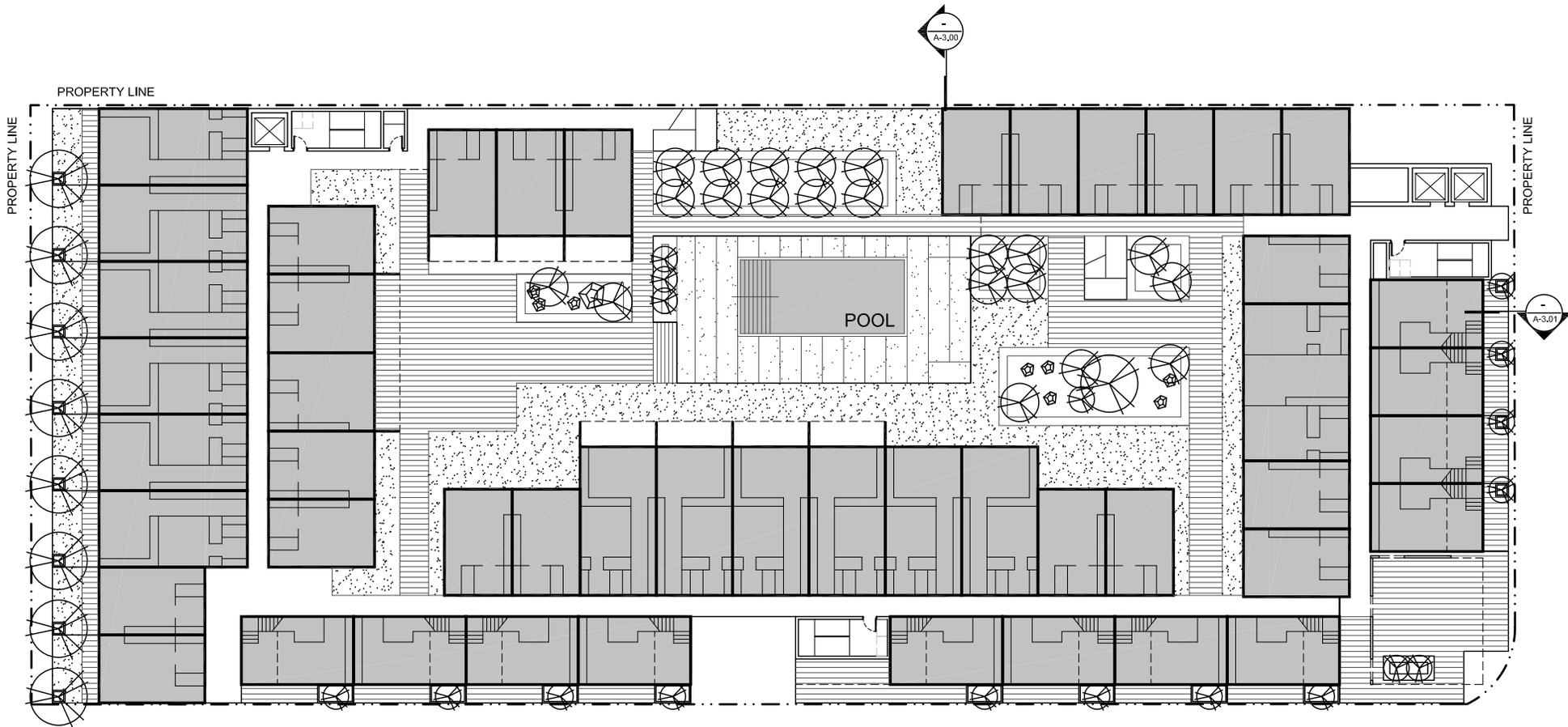
Source: Shubin + Donaldson Architects Inc., 10/29/14.



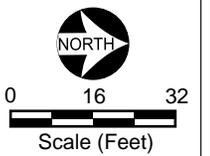


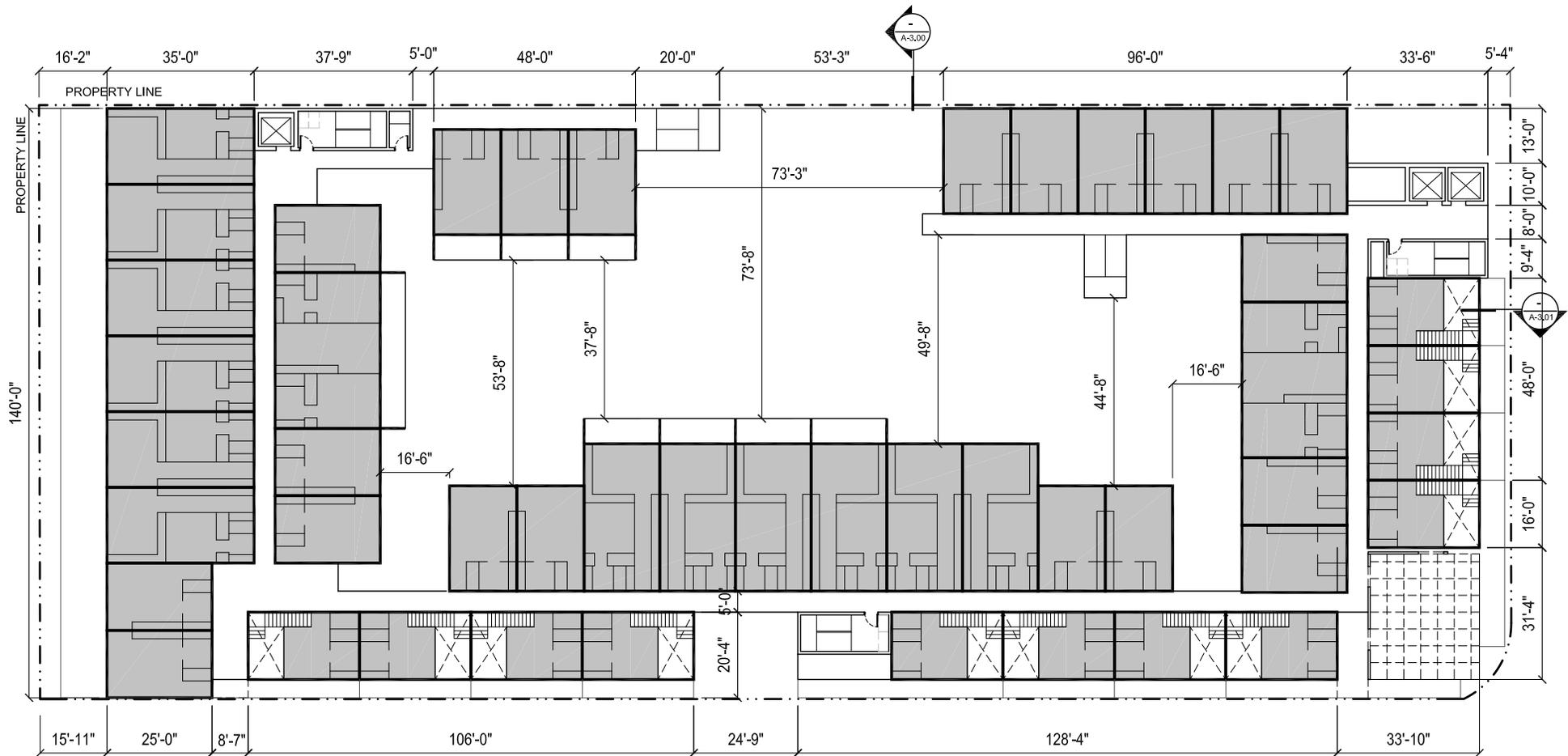
Source: Shubin + Donaldson Architects Inc., 10/29/14.



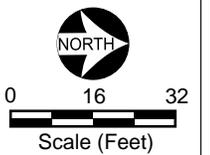


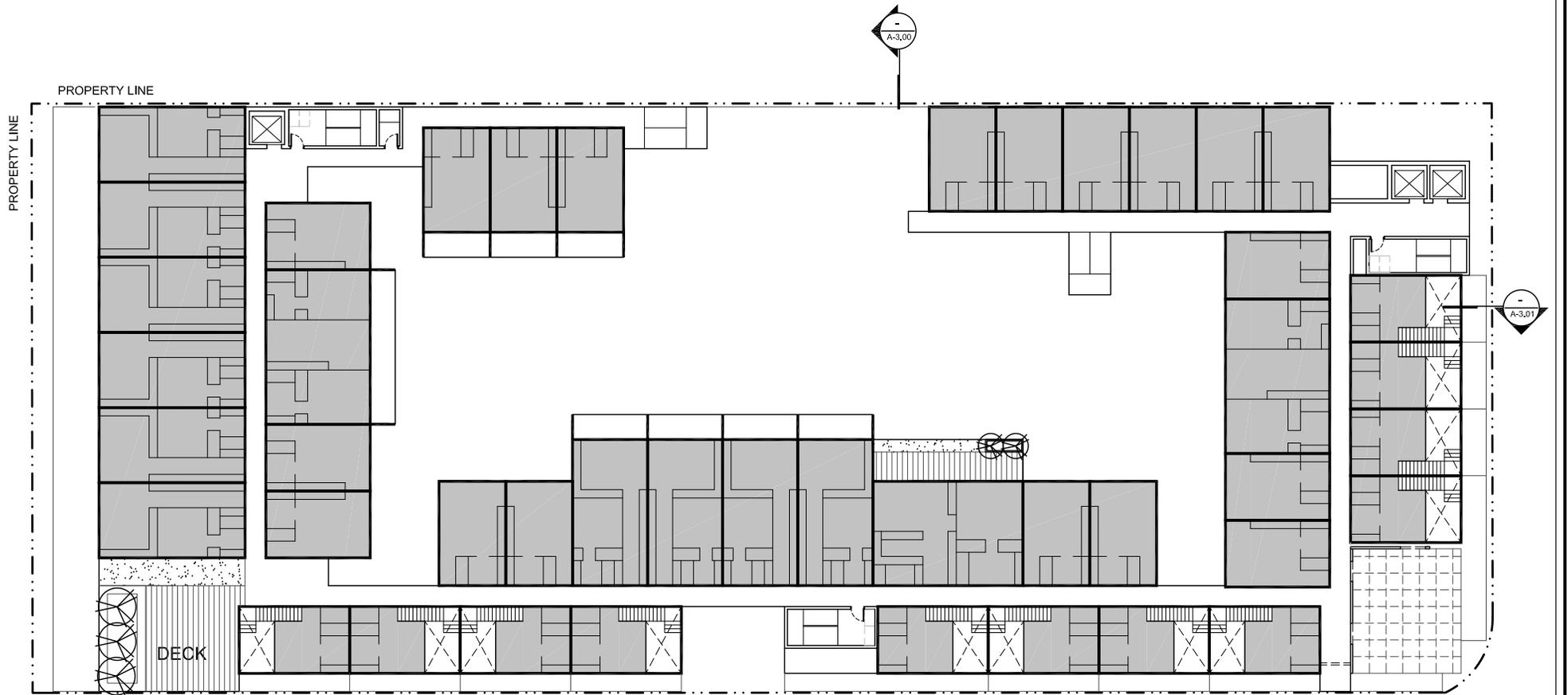
Source: Shubin + Donaldson Architects Inc., 10/29/14.



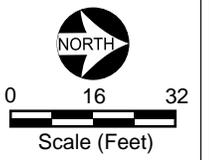


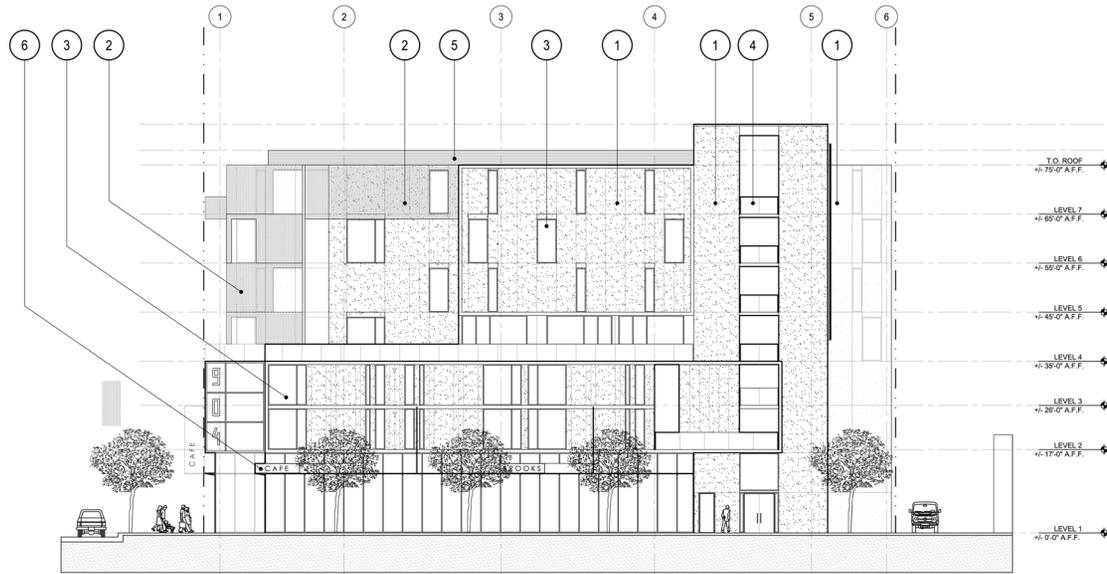
Source: Shubin + Donaldson Architects Inc., 10/29/14.





Source: Shubin + Donaldson Architects Inc., 10/29/14.

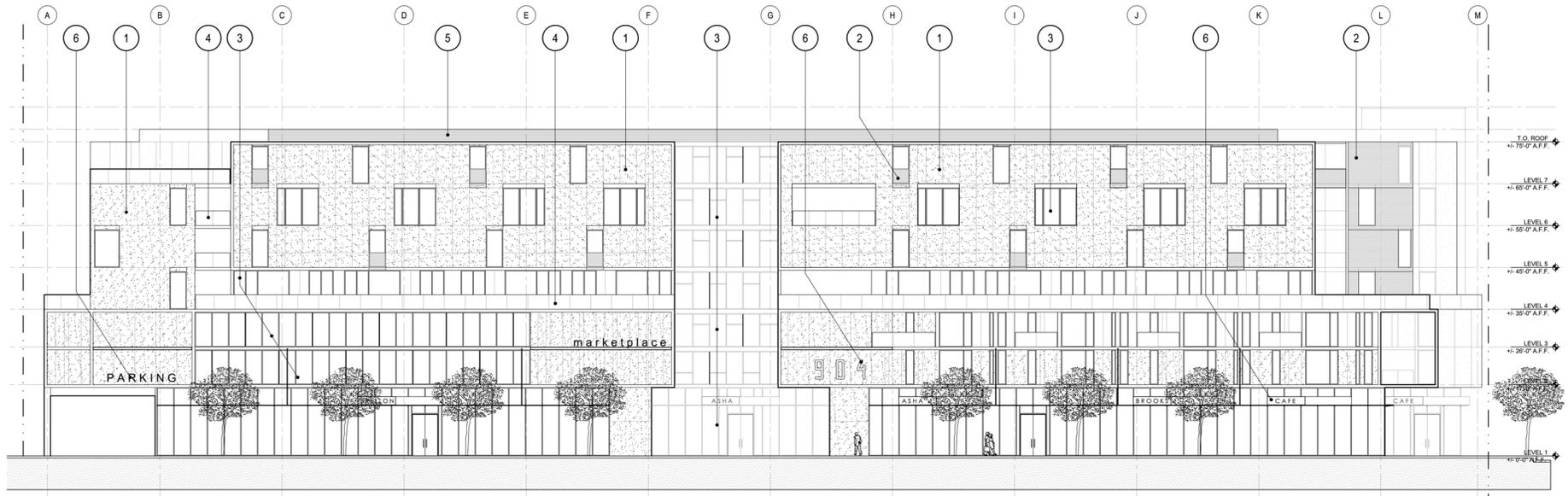




2. SOUTH ELEVATION

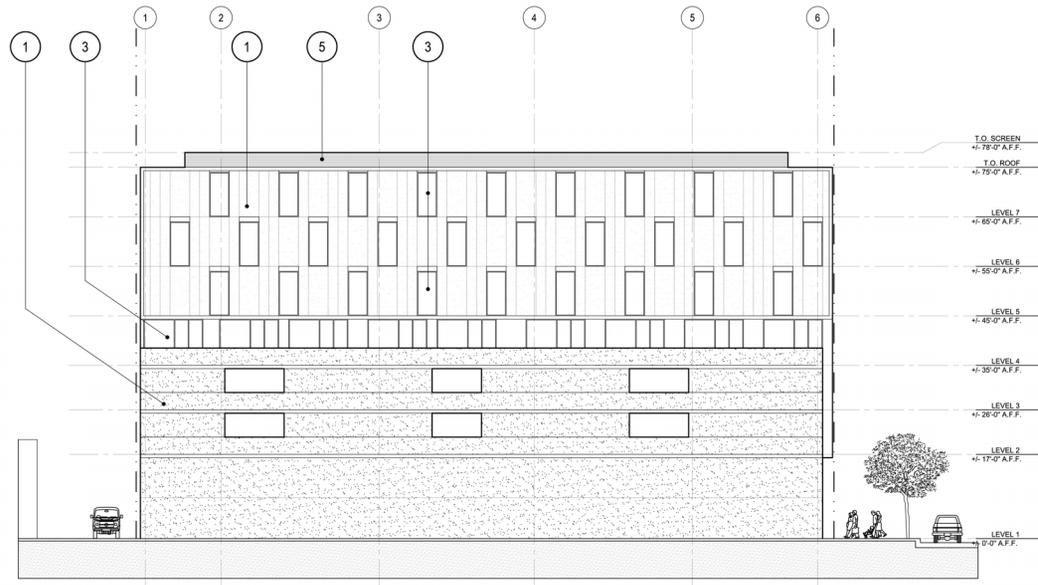
BUILDING MATERIAL NOTES:

STEEL TROWELED PLASTER, PAINTED.	1
COLOR COATED PERFORATED METAL PANELS.	2
ARCADIA ALUMINUM STOREFRONT, PPG-DURANAR MEDIUM GRAY CLASSIC FINISH, WITH LOW "E" CLEAR SOLARBAN DUAL GLAZING.	3
CANTILEVERED GLASS GUARDRAIL.	4
PROFILE METAL CLADDING SCREEN, CHARCOAL COLOR.	5
EXTRUDED ALUMINUM IDENTITY SIGNAGE WITH INTEGRAL LIGHTING.	6



1. WEST ELEVATION

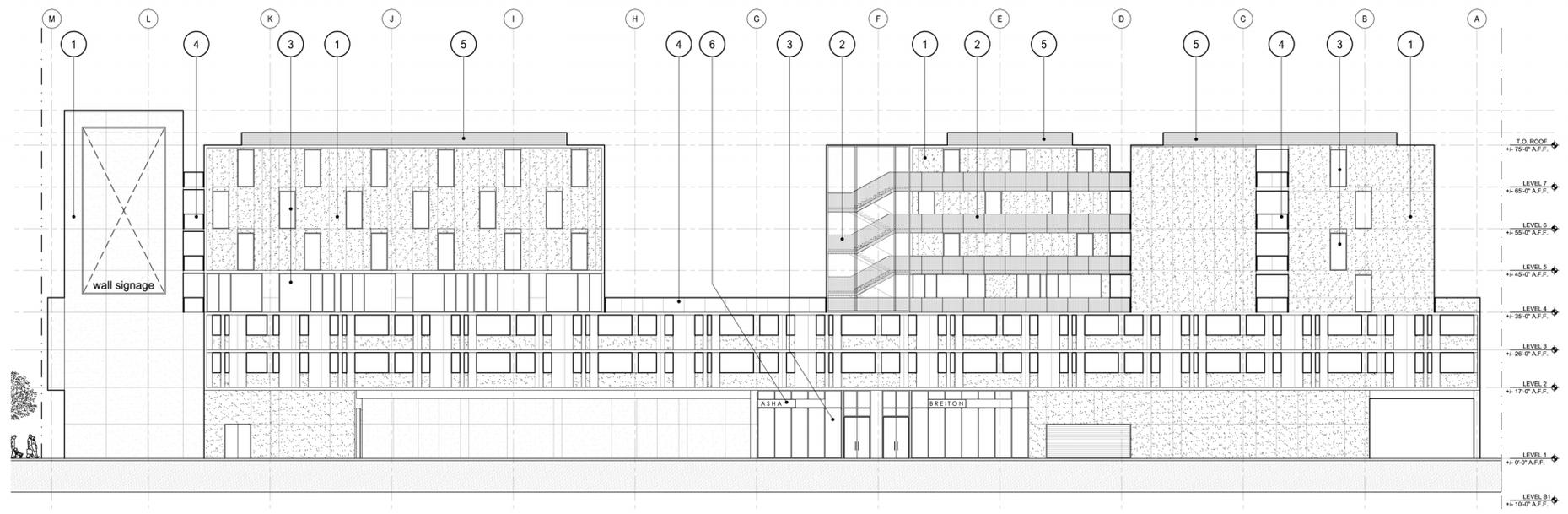
Source: Shubin + Donaldson Architects Inc., 10/29/14.



BUILDING MATERIAL NOTES:

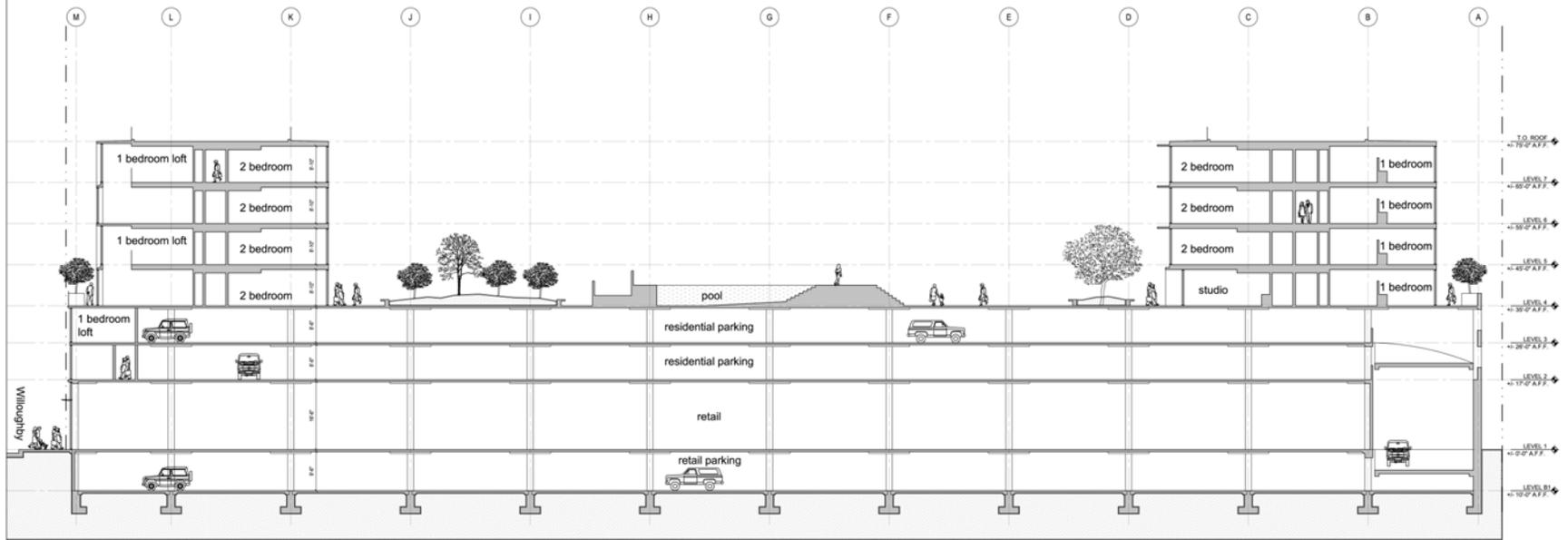
STEEL TROWELED PLASTER, PAINTED.	1
COLOR COATED PERFORATED METAL PANELS.	2
ARCADIA ALUMINUM STOREFRONT, PPG-DURANAR MEDIUM GRAY CLASSIC FINISH, WITH LOW "E" CLEAR SOLARBAN DUAL GLAZING.	3
CANTILEVERED GLASS GUARDRAIL.	4
PROFILE METAL CLADDING SCREEN, CHARCOAL COLOR.	5
EXTRUDED ALUMINUM IDENTITY SIGNAGE WITH INTEGRAL LIGHTING.	6

2. NORTH ELEVATION

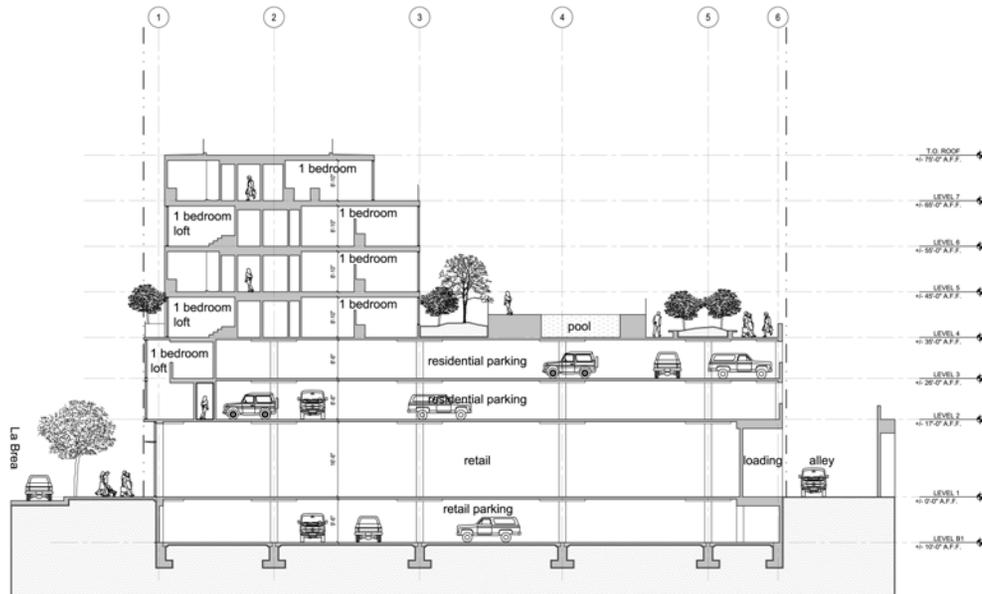


1. EAST ELEVATION

Source: Shubin + Donaldson Architects Inc., 10/29/14.



BUILDING SECTION - A



BUILDING SECTION - A

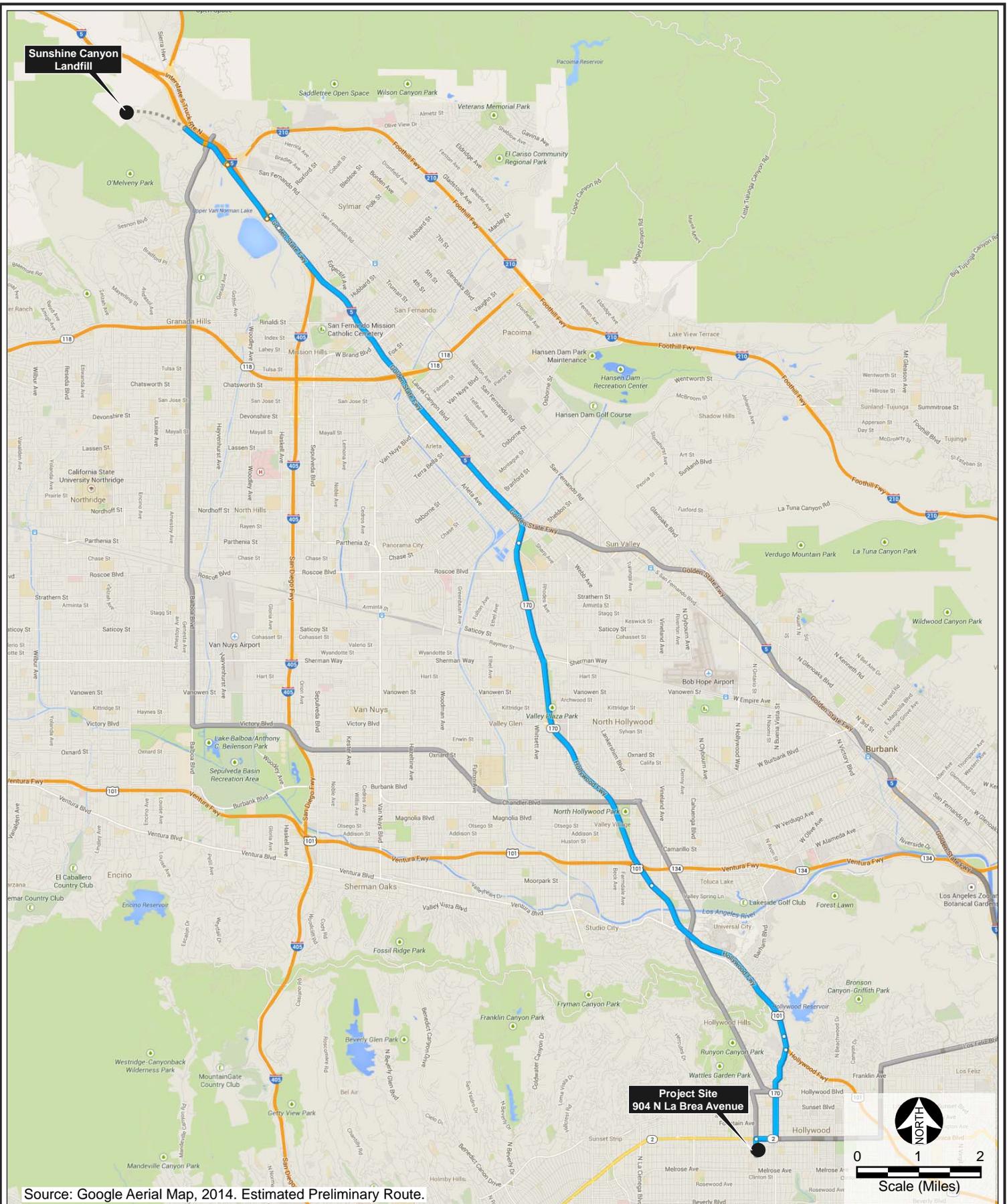
Source: Shubin + Donaldson Architects Inc., 10/29/14.



Source: Shubin + Donaldson Architects Inc., 10/29/14.



Source: Shubin + Donaldson Architects Inc., 10/29/14.



3. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS

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

Less Than Significant Impact. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. The Site is located in the Hollywood Community Plan (HCP) in the City of Los Angeles (City), approximately 5.5 miles northwest of Downtown Los Angeles and 11 miles east (inland) from the Pacific Ocean. The Community Plan covers 25 square miles, extending roughly south of Mulholland Drive and the Cities of Burbank and Glendale and the Ventura Freeway; west of the Golden State Freeway; north of Melrose Avenue and east of the Cities of West Hollywood and Beverly Hills, including a strip of land south of the City of West Hollywood and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue. Adjoining community plan areas include Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass to the north, Bel Air-Beverly Crest to the west, Wilshire to the south, and Silver Lake-Echo Park and Northeast Los Angeles to the east. The geography of Hollywood is diverse. The HCP is bisected by the Santa Monica Mountains, which extends from the HCP's northern border to Franklin Avenue. Elevations of the Santa Monica Mountain in Griffith Park vary from 384 to 1,625 feet above sea level. The flatlands stretch south from Franklin Avenue, to Melrose Avenue in the east and to Rosewood Avenue in the west. The Los Angeles River defines the northeastern edge of the HCP.

The Project Site is surrounded by an eclectic mix of urban land uses. The east side of the 900 block of North La Brea Avenue contains a three-story retail and office building (which steps up to five and six stories and 70 feet in height¹ in its rear portion at Sycamore Avenue) built to the Project Site's north property line. The west side of the 900 block of North La Brea Avenue contains a four-story office building with no front or side yard setbacks, an under-construction six-story 80-foot in height retail and office building with no front or side yard setbacks (925 La Brea), an under construction 5-story 65-foot in height residential and commercial development (La Brea Gateway), a photography shop and automobile repair facilities. The West Hollywood Gateway, which includes 250,000 square feet of commercial floor area anchored by a Target and Best Buy, is a three-four story regional shopping center located north of Romaine Street in the City of West Hollywood. A one-story commercial building is located south along Willoughby Avenue. Residential uses are located at the southeast corner of Willoughby Avenue and Sycamore Avenue. Warehouse/storage and light industrial uses are located along Sycamore Avenue. Predominantly commercial and office uses are located along La Brea Avenue. An aggregate materials batch plant (concrete plant) is also located at the northeast corner of La Brea Avenue and Romaine Street. Land uses located along the western side of Formosa Avenue include multi-family residences, a major

¹ Measured to the roof of the highest habitable floor per Elevation Plans for City of Los Angeles Planning Case CPC-2008-1663-ZC.

electricity grid facility, a five-story office building and a studio facility. South of Willoughby Avenue, the residential neighborhoods are improved with a mix of single family homes, duplexes, triplexes and four-plexes. North of Santa Monica Boulevard, residential neighborhoods include two under-construction mixed-use developments reaching six stories, as well as a mix of single family and multifamily developments.

The Project Site is in a flat area of Hollywood with a grid of streets south of Santa Monica Boulevard and is lined with a mostly commercial corridor on La Brea Avenue. The existing visual character of the surrounding locale is highly urban and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Project Site is located within a densely developed urban area. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site, structures on adjacent parcels, and the area's relatively flat topography. Due to the existing built environment, there are limited and obstructed views of the nearby Santa Monica Mountains/Hollywood Hills, located approximately 1.5 mile to the north. There are no remarkable views, or scenic vistas to the east, west, or south. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.² Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc.³

There are no tall or topographic features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community. At the street level, views in all directions are largely constrained by structures on adjacent parcels. La Brea Avenue provides the major north-south view corridor. From the public sidewalks, there are views northward toward the buildings on the corners at La Brea and Romaine Street. The Project would be located on the east side of La Brea and the southern portion between Romaine Street and Willoughby Avenue and would not affect this view. East-west views are available only from local streets in a grid pattern such as Willoughby Avenue and Romaine Street. The local area is relatively flat with no elevated positions on which any public views could be claimed. Views from the west side of La Brea Avenue looking east toward the Project Site show no substantial views.

² *Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].*

³ *L.A. CEQA Thresholds Guide, 2006, section A.1 Aesthetics.*

While the area south of the Site across Willoughby is composed of 1 and 2 story commercial buildings along La Brea and 1 and 2 story residential uses along Sycamore, the 7-story, 75-foot in height proposed building would be comparable to several other structures in the area, especially north of Willoughby, along La Brea, and thus will not introduce an incompatible scenic element into the community. Adjacent to the Project Site on the north boundary, at the southeast corner of La Brea and Romaine Street is a 3-story retail and office building with two stepped-back portions at 5-stories and 6-stories reaching 70 feet in height along the northeastern boundary on Romaine Street. Across La Brea, the under-construction La Brea Gateway Project would be approximately 5 stories when completed and the proposed 925 La Brea retail and office project would be approximately six stories and 65 feet in height. The large retail commercial center (West Hollywood Gateway) at the northwest corner of La Brea and Romaine is 3-4 stories. At the corner of Romaine Street and Formosa Avenue is a 5-story retail and office building. The surrounding uses are shown in Figures 2-6 and 2-7, Views of the Surrounding Uses. There are currently buildings on the Project Site (northern half) and on adjacent lots that obstruct views of the Hollywood Hills. No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. Therefore, impacts will be less than significant. Additionally, aesthetic impacts of a mixed-use project on an infill site within a transit priority area shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099(e). The Project is mixed-use because it incorporates both residential and retail. The Project Site is an infill location because the vicinity has been previously developed and highly urbanized. It is in a transit priority area because it is within one-half mile (approximately 1,000 feet walking distance) from the Metro Rapid 704 stop at La Brea Avenue and Santa Monica Avenue. Therefore, regardless of the City's thresholds of significance, aesthetic impacts shall not be considered significant impacts on the environment.

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

Less Than Significant Impact. A significant impact would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway. There are no identified scenic resources such as rock outcroppings or historic buildings located on-site. There are no major open spaces and there are no aesthetically significant man-made features (such as major architectural structures, monuments, or gardens) on the Project Site. The Project Site is not located within or along a designated scenic highway, corridor, or parkway. The nearest historic parkway is the Arroyo Seco Historic Parkway (I-110) between milepost 25.7 and 31.9, and is approximately 6.5 southeast of the Project Site. The Pacific Coast Highway (State Route 1) is an “Eligible State Scenic Highway – Not Officially Designated”, and is approximately 11.5 miles west of the Project Site.⁴ There are two street trees on the City sidewalk along La Brea Avenue, in front of the vacant southern half of the Project Site. These off-site street trees are part of the City's planting program and not

⁴ California Scenic Highway Mapping Systems: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm

a native originating (natural to the location) trees. There are ornamental plants and sidewalk grass strips in front of the 932 La Brea building. Therefore, impacts to scenic resources will be less than significant because the Project would not result in damage to scenic resources.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site.

Rendering views of the front of the building along La Brea are shown in Figures 2-19 and 2-20. The Project will create a mixed-use development (retail and residential) on La Brea Avenue that complements the under-construction La Brea Gateway and the West Hollywood Gateway. The Project will be compatible with and complementary to the surrounding area because it would consist of uses that already exist in the area and would blend these uses not block-by-block but within the same parcel and building. The Project will further activate the area by constructing a new, contemporary building with ground-floor retail and residential uses on the upper floors. This mixed-use development will reinvigorate a currently underutilized parcel that contains a one-story building with marginal storage and ancillary support office uses.

The Project Site is located in an urbanized and fully developed portion of the City. The built environment is characterized by a variety of architectural styles, age of buildings, type of developments, and size. Due to development directly adjacent to the north, and the alleyway to the east, the building would be primarily viewed from its La Brea Avenue and Willoughby Avenue frontages. The first floor would contain the retail space, with a residential lobby at the corner of Willoughby Avenue and the rear alley. There would be two driveways: one accessed on La Brea Avenue down to the retail parking on Level B1 and one accessed on the rear alley up to the residential parking on Levels 2 and 3. The parking on levels 2 and 3 would be shielded from view along La Brea Avenue and Willoughby Avenue by the residential lobbies, bicycle storage, and loft units. Levels 4, 5, 6, and 7 would contain residential units. Level 4 would also contain a pool deck with outdoor spaces and a clubhouse, lounge and gym space. Level 7 would contain a roof deck on the northwest portion of the Project Site.

The building design makes a clear distinction between the ground floor retail and the upper level residential uses with a transition element of color accents and large windows from the lofts that shield the parking on Levels 2 and 3. The ground floor storefront glass windows take up a larger portion of the wall area whereas the residential windows are divided with opaque wall elements. Retail identifying signage mounted at the top of the ground floor level and at the corner of La Brea Avenue and Willoughby would also provide a distinct difference compared with the upper levels. While the two uses (retail and residential) are distinctly different from a programmatic and user/pedestrian aesthetic, the building is unified through the use of complimentary colors and materials to create a design synergy along the entire frontage. The Project supports walkability with ground floor retail on La Brea Avenue. Moreover, the

Project's design reduces its apparent bulk and mass. The Project's La Brea Avenue façade features substantial vertical articulation and material changes to reduce its apparent bulk. Additionally, just as the La Brea Gateway project steps back from Willoughby Avenue on its fifth floor, the Project steps back from a portion of Willoughby Avenue at its fourth floor. Therefore, the Project would not degrade the existing visual character or quality of the Project Site and its surroundings and impacts would be less than significant.

Environmental impacts may result from project implementation due to graffiti and accumulation of rubbish and debris along the wall(s) adjacent to public rights-of-way. However, this potential impact will be mitigated to a less than significant level by the **Mitigation Measure 1-1**.

While the Project Site is under construction, construction walls and barriers will be erected, which have the potential to attract unauthorized bills and postings. These walls and barriers will be located along the Project Site west frontage on La Brea Avenue, south frontage on Willoughby Avenue, and east boundary with the alleyway. The northern boundary is at the property line with the existing three-story retail building. **Mitigation Measure 1-2** will ensure that aesthetic impacts related to construction walls and barriers are less than significant.

Willoughby Avenue currently acts as a transition point between the 1 and 2 story commercial uses to the south and the taller (existing, under construction, and proposed) uses to the north, along La Brea Avenue. The Project would not degrade a consistent design element (height) due to the natural transition point and distance. Additionally, as stated above, the Project is a mixed-use infill development in a transit priority area. As such, aesthetic impacts shall not be considered significant according to CEQA.

Other visual and aesthetic considerations

There is the potential for impacts to the visual character of the Project Site if it is not appropriately landscaped and maintained. The Project would provide landscaping on the ground level and the Level 4 outdoor areas. Environmental impacts to the character and aesthetics of the neighborhood may result from the Project. However, the potential impacts will be mitigated to a less than significant level with **Mitigation Measure 1-3**.

Mitigation Measures

1-1 Aesthetics (Vandalism)

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to Municipal Code Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Municipal Code Section 91.8104.15.

1-2 Aesthetics (Signage on Construction Barriers)

- The applicant shall affix or paint a plainly visible sign, on publicly accessible portions of the construction barriers, with the following language: “POST NO BILLS”.
- Such language shall appear at intervals of no less than 25 feet along the length of the publicly accessible portions of the barrier.
- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence. Authorized signage shall be allowed.

1-3 Aesthetics (Landscape Plan)

All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan and an automatic irrigation plan, prepared by a Landscape Practitioner (Sec. 12.40-D)

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

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

Light

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding commercial uses. Vehicle headlights from traffic on La Brea Avenue, Willoughby Avenue, and Romaine Street also contribute to overall ambient lighting levels. The Project would create additional sources of illumination. The Project Site currently contains two one-story buildings used for storage with ancillary support office, one with windows and another with a solid façade. There is on-site night/security lighting. The southern half of the Project Site is vacant. The Project would contain a 7-story building with windows and the amount of interior lighting through windows would increase. The Project will provide

illumination at street level for security. All security lighting on the upper levels will be shielded and focused on the Project Site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient “glow” presently associated with urban settings and with this part of the City, Project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses. Residential uses south of Willoughby are buffered from ambient light impacts by existing commercial/warehouse/light industrial structures and the under construction La Brea Gateway Project. The Project will include architectural features and facades with a low level of reflectivity. As such, the Project will not result in a substantial amount of light that would adversely affect the day or night time views in the Project vicinity. Though the Project will increase ambient light levels in the vicinity, the increase will not be substantial because the Project Site is located in an urbanized area that is already illuminated at night, and the Project’s lighting levels would be compatible with surrounding uses. Exterior lighting will be designed to confine illumination to the Project Site and off-site areas that do not include light-sensitive uses. Therefore, the change in levels of ambient illumination will be less than significant with implementation of **Mitigation Measure 1-4**.

Glare

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset. The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating. The Project will not result in a new source of substantial glare. Impacts will be less than significant with implementation of **Mitigation Measure 1-5**.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the sun. Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months. “Solstice” is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun’s apparent position on the celestial

sphere reaches its greatest distance above or below the celestial equator, about 23 1/2° of the arc. At winter solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. At the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year.

Screening Criteria and Thresholds of Significance⁵

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

- A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Shading, and review the associated Methodology to Determine Significance, as appropriate.
- A "no" response to the [screening criteria] indicates that there would normally be no significant impact on Shading from the proposed project.

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

Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. The Project is 75 feet in Height as defined in LAMC Section 12.03 to the highest point of the roof, structure or parapet wall. Thus, the Project exceeds the screening criteria for shadow analysis. Three times the Projects' 75-foot height equals 225 feet. Per the screening criteria of the L.A. CEQA Thresholds Guide, there are no shadow-sensitive uses within approximately 225 feet of the Project Site to the north, northwest, or northeast. The transition of the sun will move shadows along this arch (from 45 degrees/west at 9 AM to 0 degree/north at 12 PM to 45/east at 3 PM). The La Brea Gateway Project is directly west and outside of the northwest-northeast arch for shadows.

⁵ L.A. CEQA Thresholds Guide, 2006, section A.3 Shading.

While shadows could cover part of the La Brea Gateway building at 9 AM, by 12 PM, the shadows will be directly north and no longer on the La Brea Gateway site. In addition, the Gateway building would have an interior courtyard space set back by two separate residential units from La Brea Avenue and surrounding by other residential uses for an additional 3 levels in height, and that will create their own shadows on this space. Uses to the northwest include La Brea Avenue, retail, office, a photography shop and auto repair uses. Uses to the north include office and retail. The adjacent building to the north has no windows or usable outdoor spaces that would be affected. Uses to the northeast include storage/warehouse and light industrial uses. These buildings do not have useable outdoor space. Therefore, there would be no impact to shadow-sensitive uses.

Mitigation Measures

1-4 Aesthetics (Light)

Outdoor lighting shall be designed and installed with shielding, such that the light sources cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

1-5 Aesthetics (Glare)

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

2. AGRICULTURE AND FORESTRY RESOURCES

- a) **Would the project convert prime farmland, unique farmland, or farmland of statewide importance (farmland), as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California resources agency, to non-agricultural use?**

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California.

The Project Site is zoned MR1-1 (Restricted Industrial Zone, Height District 1), and the General Plan land use designation for the Project Site is Limited Manufacturing. The Project Site’s northern half contains two buildings operating as storage space with ancillary support office and the southern half contains vacant land (formerly occupied with buildings and surface parking which were removed). The Project Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.⁶ Therefore, the Project would have no impact on the conversion of farmland to non-agricultural uses.

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

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.⁷ The Project Site is not zoned for agricultural use and is not subject to a Williamson Act Contract. The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use. Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

- c) **Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public**

⁶ State of California Department of Conservation, *Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map*, website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf>, March 31, 2014.

⁷ State of California Department of Conservation, *Williamson Act Program*, website: <http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx>, accessed March 31, 2014.

Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

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

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

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

e) Would the project involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

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

3. AIR QUALITY

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

A Air Quality, Noise, and Greenhouse Gases Appendices, DKA Planning, September 2014.

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

Less Than Significant Impact. In the case of projects proposed within the City or elsewhere in the South Coast Air Basin (the “Basin”), the applicable plan is the 2012 Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Management District (SCAQMD). SCAQMD adopted the final 2012 AQMP on December 7, 2012.⁸ The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces measures through educational programs or fines, when necessary.

Consistency with the SCAQMD’s 2012 Air Quality Management Plan

The proposed residential and retail land uses will neither conflict with the SCAQMD’s 2012 Air Quality Management Plan (AQMP) nor jeopardize the region’s attainment of air quality standards. The regional ozone attainment plan centers on accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG’s growth forecasts from the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The RTP/SCS projects population, household and employment growth using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).⁹ SCAG adjusted and distributed regional population, household and employment growth to localities in accordance with local input including 2008 land use designations and zoning. The RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020. The Project is consistent with the RTP/SCS population, household and employment projections because the projections are derived from cohort-component model which does not analyze parcel-level land use designation and zoning. The projections only considered general plan designations and zoning to reconcile the regional distribution of employment growth. Moreover, even to the extent land use designation and zoning affected projections, the Project’s General Plan Amendment and Zone

⁸ SCAQMD, AQMP: <http://www.aqmd.gov/aqmp/aqmpintro.htm>

⁹ SCAG, 2012-2035 Sustainable Communities Strategy Regional Transportation Plan, p. 22-37.

Change pertain to an exceedingly small share of the City's land. The conversion of 1.15 acres represents a decrease of approximately 0.006% of the approximately 19,000 acres of industrially-zoned land, and a comparable increases in the percentage of land zoned R4 or C2. Thus, the Project's General Plan Amendment and Zone Change do not alter the reliability of the RTP/SCS projections. Additionally, the Project Site is located in the Hollywood Community Plan area that implements land use standards of the General Plan Framework at the local level.¹⁰ The Project is consistent with the City's growth capacity for the HCP, which accommodated a population of 219,000 in 2010.¹¹

The Project would develop 169 multi-family dwelling units and 37,385 square feet of commercial retail space in the City of Los Angeles. Though the City has not updated the growth forecast for the area, the Project would add approximately 475 residents. As shown in the Population and Housing section in this IS/MND, the Project would not conflict with SCAG's projections, the City's projections, or represent any significant population or housing increase. The additional residents and housing units represent 0.33 percent and 0.8 percent, respectively of the City's anticipated growth from 2012 to 2020 according to SCAG. The Project would represent a negligible percent of the Department of Finance's estimated 2014 population and housing units in the City. The Project is not of the size and scope that it would induce substantial population growth and is not a project of statewide, regional, or areawide significance, according to CEQA Guidelines Section 15206(b).

Because the projected growth is not inconsistent with the RTP/SCS' assumption about growth in the City over time, the Project's direct and indirect impacts on attainment of ozone standards are not technically accommodated in the regional emissions inventory for the 2012 AQMP. The Project is infill development that generally produces a smaller impact on regional emissions because it accommodates growth in an urban area with commercial density and transportation infrastructure that ultimately reduces vehicle travel demand and activity. However, because the Project site is classified as "Limited Manufacturing" in the Community Plan, the RTP/SCS' assumptions about growth in the City did not assume housing and population growth on this site. As such, the Project could conflict with the growth assumptions in the regional air quality attainment plan. However, The City of Los Angeles shall coordinate with the Southern California Association of Governments to update the RTP/SCS growth assumptions for the Project Site and other conversions of industrial land to residential land so air quality impacts from the proposed development are reflected in the regional AQMP. This would ensure that the air quality impacts of residential development on the Project site will be accommodated in the region's emissions inventory for the RTP/SCS and AQMP.

Consistency with City of Los Angeles General Plan Air Quality Element

¹⁰ While the City had adopted an update to its Community Plan, it rescinded the update based on a Los Angeles Superior Court decision on the Plan's EIR. As a result, the City has reverted back to the 1988 Plan and zoning regulations in effect prior to June 19, 2012.

¹¹ City of Los Angeles, Hollywood Community Plan, www.cityplanning.lacity.org/complan/pdf/HwdCpTxt.pdf. 1988.

The City’s Air Quality Element relies on SCAQMD’s guidance and requirements in this area to determine the significance of development on air quality. Based on the analysis in this section, the Project with mitigation would not have significant cumulatively considerable impacts on local or regional air quality during construction or operations of the project. In addition, the Element identifies several policies that are relevant to the Project. Table 3.3-1, General Plan Air Quality Element, assesses the Project’s consistency with the applicable policies of the Air Quality Element. Based on this assessment, the Project would be consistent with the Air Quality Element.

**Table 3.3-1
General Plan Air Quality Element**

Policy	Analysis
Policy 1.3.1 Minimize particulate emissions from construction sites.	Consistent. Construction activities will comply with SCAQMD Rule 403 that governs fugitive dust. Best management practices will be employed that reduce local exposure to PM ₁₀ and PM _{2.5} .
Policy 1.3.2 Minimize particulate emissions from unpaved roads and parking lots, which are associated with vehicular traffic.	Consistent. There will be no unpaved roads or parking lots. All areas will be paved and developed.
Policy 4.1.1 Coordinate with all appropriate regional agencies the implementation of strategies for the integration of land use, transportation, and air quality policies.	Consistent. The Project has a mix of uses (residential and retail), is an urban infill project that adds uses in an urban area with significant job demand and is served by Metro transit.
Policy 4.3.2. Revise the City’s General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	Consistent. The Project will amend the Hollywood Community Plan to achieve a more compact, efficient urban form near existing density of jobs and housing. The Project is a mixed-use development on a transit corridor and it is in close proximity to existing and planned transit infrastructure.
Policy 4.2.2 Improve accessibility for the City’s residents to places of employment, shopping centers, and other establishments.	Consistent. The area is served by Metro transit and is located in close proximity to employment and shopping opportunities.
Policy 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. The Project includes pedestrian activity on the ground-floor with retail spaces. Bicycle parking would be provided. Vehicle parking would be on site.
Policy 4.2.4 Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The Project is being evaluated under CEQA for air quality impacts and complies with this policy.
Policy 5.1.2 Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	Consistent. The Project will comply with CalGreen requirements as required by Code. In addition, the Project will include several features that will help to minimize energy consumption, including access to public transportation and designated bike storage areas.

Table: CAJA Environmental Services, September 2014.

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

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

Pollutants and Effects

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

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions; primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.¹² The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood’s ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

¹²*Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.*

- Ozone (O₃) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO_x) react in the presence of ultraviolet sunlight. O₃ is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_x, the components of O₃, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O₃ formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O₃ at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.
- Nitrogen Dioxide (NO₂) like O₃, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO₂ are collectively referred to as NO_x and are major contributors to O₃ formation. NO₂ also contributes to the formation of PM₁₀. High concentrations of NO₂ can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO₂ and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.
- Sulfur Dioxide (SO₂) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO₂ are coal and oil used in power plants and industries. Generally, the highest levels of SO₂ are found near large industrial complexes. In recent years, SO₂ concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO₂ and limits on the sulfur content of fuels. SO₂ is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO₂ can also yellow plant leaves and erode iron and steel.
- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or PM_{2.5}, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, PM_{2.5} can be formed in the atmosphere from gases such as SO₂, NO_x, and VOC. Inhalable particulate matter, or PM₁₀, is about 1/7 the thickness of a human hair. Major sources of PM₁₀ include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

PM_{2.5} and PM₁₀ pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM_{2.5} and PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung

diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM₁₀ tends to collect in the upper portion of the respiratory system, PM_{2.5} is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

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

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

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

Regulatory Setting

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by CARB. As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO₂, O₃, PM_{2.5}, PM₁₀, SO₂, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved.

California Air Resources Board (CARB). In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

South Coast Air Quality Management District (SCAQMD). The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP.

SCAQMD adopted the final 2012 AQMP on December 7, 2012.¹³ The 2012 AQMP became effective in February 2013. The 2012 AQMP addresses several state and federal planning requirements, incorporating new scientific information, primarily in the form of updated emissions inventories, ambient measurements, and new meteorological air quality models. This Plan builds upon the approaches taken in the 2007 AQMP for the South Coast Air Basin for the attainment of federal PM and ozone standards, and highlights the significant amount of reductions needed and the urgent need to engage in interagency coordinated planning to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under the federal Clean Air Act.¹⁴ In addition to criteria pollutants, the SCAQMD also regulates air toxics. In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

Project Impacts

Construction Phase

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2013.2.2 model using the Project's construction schedule of 21 months and a blend of model assumptions and developer input about the potential number and mix of off-road construction equipment by construction phase. Key assumptions include a net export of 30,000 cubic yards of earth; demolition (30 days), site preparation (14 days), grading (6 weeks), and building construction (18 months). The analysis also assumes approximately 1.15 acres would be disturbed during the grading phase for modeling purposes.

As shown in Table 3.3-2, the construction of the Project will produce VOC, CO, SO_x, PM₁₀ and PM_{2.5} emissions that do not exceed the SCAQMD's regional thresholds. However, construction-related emissions of NO_x will exceed the recommended threshold of 100 pounds per day, largely due to the significant numbers of diesel-fueled loaders and other off-road vehicles used during grading and building construction activities. As a result, construction of the Project would contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered significant but mitigable.

In terms of local air quality, the Project would produce significant emissions that would exceed the SCAQMD's recommended localized standards of significance for NO_x, PM₁₀, and PM_{2.5}. As a result, construction impacts on localized air quality are considered significant but mitigable.

¹³ SCAQMD, AQMP: <http://www.aqmd.gov/aqmp/aqmpintro.htm>

¹⁴ SCAQMD, 2012 AQMP: <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/MainDoc.pdf>

**Table 3.3-2
Estimated Daily Construction Emissions - Unmitigated**

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition						
On-Site Emissions	3	25	19	<1	2	2
Off-Site Emissions	<1	1	2	<1	<1	<1
Total Emissions	3	26	21	<1	2	2
Site Preparation						
On-Site Emissions	5	55	33	<1	9	6
Off-Site Emissions	<1	1	1	<1	<1	<1
Total Emissions	5	55	34	<1	9	6
Grading						
On-Site Emissions	13	143	88	<1	12	9
Off-Site Emissions	<1	5	4	<1	<1	<1
Total Emissions	13	148	92	<1	12	9
Building Construction						
On-Site Emissions	23	197	135	<1	12	11
Off-Site Emissions	2	14	24	<1	2	1
Total Emissions	25	211	159	<1	14	12
Architectural Coating						
On-Site Emissions	52	3	2	<1	<1	<1
Off-Site Emissions	1	7	12	<1	1	<1
Total Emissions	53	10	14	<1	1	<1
Maximum Regional Total (maximum daily emissions for each pollutant regardless of phase)	53	211	159	<1	14	12
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	Yes	No	No	No	No
Maximum Localized Total	52	197	135	<1	12	11
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	No	Yes	No	No	Yes	Yes

figures are rounded to the nearest integer.

Source: DKA Planning, 2014 based on CalEEMod 2013.2.2 model runs. Data in Appendix A to this IS/MND.
LST analyses based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.

Mitigation Measures 3-1 through **3-4** are recommended to minimize localized emissions of particulates from both exhaust and fugitive dust emissions. **Mitigation Measure 3-5** is designed to reduce on-site emissions of NO_x from tailpipe exhausts by lowering sulfur content and other technological enhancements.

Mitigation Measures

- 3-1** During site preparation and grading, the unpaved portions of the site shall be watered at least three times daily to reduce PM₁₀ and PM_{2.5} emissions.
- 3-2** Ground cover shall be replaced and/or installed as soon as practical to reduce fugitive PM₁₀ and PM_{2.5} emissions.
- 3-3** Tracking of dirt and mud from the Project Site onto local streets shall be minimized through use of truck wheel washers or equivalent measures.
- 3-4** All diesel-fueled off-road construction equipment used in the grading and construction phases shall have Level 2 or 3 diesel particulate filters installed that are certified by the California Air Resources Board to reduce PM₁₀ and PM_{2.5} emissions.
- 3-5** All diesel-fueled off-road construction equipment used in the grading and construction phases shall have Tier 3 or 4 engines that are certified by the U.S. EPA installed to reduce NO_x emissions.

Table 3.3-3 shows the net construction emissions following implementation of the mitigation measures. Impacts would be reduced to less than significance with mitigation.

**Table 3.3-3
Estimated Daily Construction Emissions - Mitigated**

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition						
On-Site Emissions	<1	10	13	<1	<1	<1
Off-Site Emissions	<1	1	2	<1	<1	<1
Total Emissions	1	12	15	<1	<1	<1
Site Preparation						
On-Site Emissions	1	21	29	<1	3	2
Off-Site Emissions	<1	1	<1	<1	<1	<1
Total Emissions	1	22	29	<1	3	2
Grading						

**Table 3.3-3
Estimated Daily Construction Emissions - Mitigated**

Construction Phase	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
On-Site Emissions	3	63	82	<1	3	3
Off-Site Emissions	<1	5	4	<1	<1	<1
Total Emissions	3	68	86	<1	3	3
Building Construction						
On-Site Emissions	5	73	120	<1	3	3
Off-Site Emissions	2	13	24	<1	3	1
Total Emissions	7	86	144	<1	6	4
Architectural Coating						
On-Site Emissions	52	2	2	<1	<1	<1
Off-Site Emissions	1	7	12	<1	1	<1
Total Emissions	53	9	14	<1	1	<1
Maximum Regional Total (maximum daily emissions for each pollutant regardless of phase)	53	86	144	<1	6	4
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	52	73	120	<1	3	<3
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	No	No	No	No	No	No
<i>Source: DKA Planning, 2014 based on CalEEMod 2013.2.2 model runs. Data in Appendix A to this IS/MND. LST analyses based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.</i>						

Operational Phase

The Project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could add up to 2,072 net vehicle trips daily, with up to 93 in the peak AM hour and up to 186 vehicles in the peak PM hour.¹⁵ Other sources of emissions include area sources (e.g., fireplaces) and energy sources (e.g., electricity, natural gas). As shown in Table 3.3-4, Estimated Daily Operations Emissions – Unmitigated, operational emissions would not exceed

¹⁵ Overland Traffic Consultants, *Traffic Impact Analysis for a Mixed-Use Project Located at 904-932 La Brea Avenue*; July, 2014.

SCAQMD’s regional significance thresholds for VOC, NO_x, CO, PM₁₀ and PM_{2.5} emissions. The Project’s minimal on-site emissions from area and energy sources would also not approach localized emission thresholds set by the SCAQMD for operational emissions (i.e., 1 lb/day PM_{2.5}, 3 lb/day PM₁₀, 74 lb/day NO_x, and 680 lb/day CO. As a result, the Project’s operational impacts on regional air quality are considered less than significant.

**Table 3.3-4
Estimated Daily Operations Emissions - Unmitigated**

Emissions Source	Pounds Per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	5	<1	14	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	7	22	89	<1	17	5
Proposed Operations	13	23	103	<1	17	5
Existing Operations	-1	-1	-3	<-1	-1	<-1
Net Operations	12	22	100	<1	16	5
SCAQMD Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

Source: DKA Planning 2014 based on CalEEMod 2013.2.2 model runs. Data in Appendix A to this IS/MND.

- c) **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative threshold for ozone precursors)?**

Less Than Significant with Mitigation Incorporated. Construction of the proposed Project would not contribute significantly to cumulative emissions of pollutants for any non-attainment pollutants. For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for VOC or NO_x during construction (with implementation of **Mitigation Measures 3-1** through **3-5**) or operations. As such, the Project’s impact on cumulative ozone precursor emissions would be considered less than significant. Table 3.3-3 illustrates net construction emissions following implementation of mitigation measures.

Construction of the Project would produce cumulatively considerable emissions of localized nonattainment pollutants PM₁₀, PM_{2.5} and NO₂, as the anticipated emissions would exceed LST thresholds set by the SCAQMD. This is considered a significant but mitigable impact. With implementation of **Mitigation Measures 3-1** through **3-5** impacts would be reduced to less than significance.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity to each other. There are several potential construction projects near the Project Site identified as potential contributors of cumulative PM_{2.5}, PM₁₀, and NO_x emissions.

- The related project No. 37 at 936 La Brea Avenue, adjacent to the north of the Project Site is a mixed-use project with 88,750 square feet of office and 12,000 square feet of retail. This is a reuse of an existing building and not expected to contribute to construction emissions.
- The related project No. 54 at 925 La Brea Avenue approximately 100 feet west of the Project Site (across La Brea Avenue) is a mixed-use project with approximately 46,527 square feet of office and 15,265 square feet of retail. This Project is being evaluated in ENV-2014-2078 by the City and would not result in significant construction impacts on localized air quality.¹⁶
- The related project No. 15 at t 915 La Brea Avenue approximately 100 feet west of the Project Site (across La Brea Avenue) is expected to be completed with construction and starting occupancy when the Project could begin its construction phase.

Other potential projects in the area are more than 600 feet away and not likely to influence localized pollutant concentrations at sensitive receptors adjacent to the Project Site. Even if these nearby projects were to undertake construction concurrently with the Project, localized PM_{2.5}, PM₁₀, and NO₂ concentrations would not exceed ambient air quality standards at nearby receptors. Future development that could generate construction emissions concurrently as the Project would be judged against the SCAQMD's LST thresholds and perform dispersion modeling if potential violations of health standards were to occur.

As for cumulative operational impacts, the proposed land uses will neither not jeopardize the region's attainment of air quality standards. The Project would add approximately 475 residents. As shown in Air Quality, Population and Housing, and Utilities and Service Systems sections in this IS/MND, the Project would not conflict with SCAG's projections, the City's projections, or represent any significant population or housing increase. The additional residents and housing units represent 0.33 percent and 0.8 percent, respectively of the City's overall anticipated growth from 2012 to 2020 according to SCAG. The Project would represent a negligible percent of the estimated 2014 population and housing units in the City (according to the Department of Finance). The Project is not of the size and scope that it would induce substantial population growth and is not a project of statewide, regional, or areawide significance, according to CEQA Guidelines Section 15206(b).

However, because the Project Site is classified as "Limited Manufacturing" in the Community Plan, the RTP/SCS' assumptions about growth in the City did not assume housing and population growth on this site. As such, the Project conflicts with the growth assumptions in the regional air quality attainment

¹⁶ Page 4-18, <http://cityplanning.lacity.org/staffrpt/mnd/ENV-2014-2078.pdf>

plan. Because the projected growth is inconsistent with the RTP/SCS' assumption about growth in the City over time, the Project's direct and indirect impacts on attainment of ozone standards are not technically accommodated in the regional emissions inventory for the 2012 AQMP. However, the City of Los Angeles shall coordinate with the Southern California Association of Governments to update the RTP/SCS growth assumptions for the Project site so air quality impacts from the proposed development are reflected in the regional AQMP. This would ensure that the air quality impacts of residential development on the Project site will be accommodated in the region's emissions inventory for the RTP/SCS and AQMP.

Because the projected growth is not inconsistent with the RTP/SCS' assumption about growth in the City over time, the Project's direct and indirect impacts on attainment of ozone standards are accommodated in the regional emissions inventory for the 2012 AQMP. Locally, the Project will not result in cumulatively considerable emissions of nonattainment pollutants NO₂, PM₁₀, PM_{2.5} or lead. The Project is a mixed-use retail and residential project that does not include major sources of combustion or fugitive dust. As a result, its localized emissions would be minimal. Similarly, existing land uses in the area include residential, institutional, retail, and commercial office uses that do not produce substantial emissions of localized nonattainment pollutants.

Even if these nearby projects were to undertake construction concurrently with the Project, localized PM_{2.5}, PM₁₀, and NO₂ concentrations would not exceed ambient air quality standards at nearby receptors as each potential cumulative construction project would need to reduce construction emissions below the LST thresholds or perform dispersion modeling that would confirm that cumulative emissions would not result in violations of air quality standards. Future development that could generate construction emissions concurrently as the Project would be judged against the SCAQMD's LST thresholds and perform dispersion modeling if potential violations of health standards were to occur. With implementation of **Mitigation Measures 3-1** through **3-5** impacts would be reduced to less than significance.

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

Less Than Significant with Mitigation Incorporated. There are several existing and future sensitive receptors near the Project Site, including:

- 915 North La Brea (La Brea Gateway mixed-use residential and retail project). This development across La Brea Avenue from the Project Site is under construction and expected to be operational in 3rd quarter 2015,¹⁷ when construction of the Project could occur. The residential units would be located approximately 100 feet to the west, across La Brea Avenue.

¹⁷ La Brea Gateway, "Early occupancy starts September 2015. <http://www.labreaprogress.com/about.html>

- 860 Sycamore Avenue, an existing single-family residence 245 feet to the east of the Project Site's southeast boundary. While this is the residence nearest the Project Site, there are many more residences in this residential neighborhood.
- 7118 Willoughby Avenue, an existing multi-family residential building that is 220 feet southwest of the Project Site. This residence is the closest to the Project Site to the west across La Brea Avenue.

Construction activities during grading and building construction would exceed SCAQMD LST thresholds for NO_x, PM_{2.5}, or PM₁₀ and represent a significant but mitigable impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard. As shown in Table 3.3-3, construction of the Project would not result in on-site emission increases that exceed the LST thresholds set by the SCAQMD following implementation of **Mitigation Measures 3-1** through **3-5**. As a result, the Project would not contribute to any localized violations of the CO, NO_x, PM_{2.5}, or PM₁₀ standards at any local sensitive receptors.

The application of LST thresholds to each cumulative project in the local area would help ensure that each project does not produce localized hotspots of PM_{2.5}, PM₁₀, and NO₂. Pursuant to the SCAQMD's CEQA Air Quality Guidelines, any projects that would exceed LST thresholds should perform dispersion modeling to ensure that any localized exceedances of air quality standards are mitigated below significance threshold. Receptors that are located further downwind would not be threatened with exceedances of health-based standards, and emissions significantly disperse as a function of atmospheric stability, mixing heights, and other variables, with distance a critical factor. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting LST mass emissions thresholds for PM₁₀ that generally double with every doubling of distance. As such, the cumulative impact of construction projects on local sensitive receptors would not result in local exceedances of ambient air quality standards for NO₂, PM₁₀, and PM_{2.5}, as projected emissions from each potential cumulative construction project would not exceed LST thresholds, or would be analyzed through dispersion modeling to validate that exceedances of air quality standards would not occur.

Long-term operations of the Project would not result in exceedances of CO air quality standards at roadways in the area. This is due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not produce significant increase in traffic congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot. Screening analysis guidelines for localized CO hotspot analyses from Caltrans recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.¹⁸ Specifically, projects that significantly increase the percentage of

¹⁸ Caltrans, *Transportation Project-Level Carbon Monoxide Protocol*, updated October 13, 2010.

vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. Traffic levels of service at the 11 intersections studied in the vicinity of the Project would not be significantly impacted by traffic volumes from the development under existing or 2018 horizon scenarios.¹⁹ In addition, the Project would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow.

Finally, TAC emissions are not expected to be significant, as the proposed Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.²⁰ The proposed Project is not anticipated to generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities, and any minimal TAC impacts are expected to be less than significant.

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

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

¹⁹ *Overland Traffic Consultants, Traffic Impact Analysis for a Mixed-Use Project Located at 904-932 La Brea Avenue. July 2014.*

²⁰ *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.*

4. BIOLOGICAL RESOURCES

- a) **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

No Impact. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife²¹ (CDFW) or the U.S. Fish and Wildlife Service (USFWS). The Project Site is located in an urbanized area of the City. The Project Site is zoned MR1-1 (Restricted Industrial Zone, Height District 1), and the General Plan land use designation for the Project Site is Limited Manufacturing. The Project Site's northern half contains two buildings operating as storage space with ancillary support office and the southern half contains vacant land (formerly occupied with buildings (studio production supply store) and surface parking which were removed). There are two street trees on the City sidewalk along La Brea Avenue, in front of the vacant southern half. These are off-site street tree as part of the City's planting program and not a native originating (natural to the location) trees. There are ornamental plants and sidewalk grass strips in front of the 932 La Brea building. There are no City or County significant ecological areas.²² The Project will not result in a take of nesting native bird species. Therefore, the Project will not have a direct impact on any identified species because none are present on this highly urbanized Project Site and the Project will not modify any habitat that would affect identified species because no habitat exists on this highly urbanized Project Site.

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS were to be adversely modified without adequate mitigation. The Project Site's northern half contains two buildings operating as storage space and ancillary support office and the southern half contains vacant land (formerly occupied with buildings (studio production supply store) which were removed). No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. The nearest riparian habitat is in the Hollywood Hills north of Hollywood Boulevard and west of La Brea Avenue, classified as

²¹ Effective January 1, 2013, the California Department of Fish and Game changed its name to the California Department of Fish and Wildlife: <http://www.dfg.ca.gov/about/namechange.html>

²² Navigate LA, City of Los Angeles, Bureau of Engineering, Significant Ecological Areas layer: <http://navigatela.lacity.org/index01.cfm>

Forested/Shrub Riparian and within Wattles Garden Park and Runyon Canyon Park.²³ These habitat areas are approximately 1.5 miles north of the Project Site and will not be affected by Project construction or operations. Therefore, no impact to riparian habitat or sensitive natural community will occur.

- c) **Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project without adequate mitigation. The Project Site's northern half contains two buildings operating as storage space with ancillary support office and the southern half contains vacant land (formerly occupied with buildings (studio production supply store) which were removed). No federally protected wetlands (e.g., estuarine and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site. The nearest wetland is in the Hollywood Hills north of Hollywood Boulevard and west of La Brea Avenue. These are classified as Riverine and Freshwater Forested/Shrub Wetlands and are within Wattles Garden Park and Runyon Canyon Park.²⁴ These habitat areas are approximately 1.5 miles north of the Project Site and will not be affected by Project construction or operations. Therefore, the Project will not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. No impact to federally protected wetlands will occur.

- d) **Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

No Impact. A significant impact would occur if a project would interfere with or remove access to a migratory wildlife corridor or impede the use of wildlife nursery sites. The Project Site's northern half contains two buildings operating as storage space with ancillary support office and the southern half contains vacant land (formerly occupied with buildings (studio production supply store) which were removed). Due to the existing urban development on the Project Site and in the adjacent surroundings, the Project Site does not function as a corridor for the movement of native or migratory animals. Additionally, no native wildlife nurseries are located in the Project area. Therefore, no impacts to migratory wildlife corridors or native wildlife nursery site will occur.

²³ U. S. Fish & Wildlife Service, *National Wetlands Inventory, Wetlands Mapper*, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed July 2, 2014.

²⁴ U. S. Fish & Wildlife Service, *National Wetlands Inventory, Wetlands Mapper*, website: <http://www.fws.gov/wetlands/Data/Mapper.html>, accessed July 2, 2014.

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

No Impact. A project-related significant adverse effect could occur if a project would cause an impact that is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance. The Project Site is located in an urbanized area of the City. The Project Site's northern half contains two buildings operating as storage space with ancillary support office and the southern half contains vacant land (formerly occupied with buildings (studio production supply store) which were removed). There are two street trees on the City sidewalk along La Brea Avenue, in front of the vacant southern half. These are off-site street trees as part of the City's planting program and not natural to the location. There are ornamental plants and sidewalk grass strips in front of the 932 La Brea building. The Project would not impact any protected trees. Therefore, the Project would not conflict with any local policy or ordinance protecting biological resources.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. A significant impact would occur if a project is inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site is located in an urbanized area of the City. The Project Site's northern half contains two buildings operating as storage space with ancillary support office and the southern half contains vacant land (formerly occupied with buildings (studio production supply store) which were removed). Due to the existing urban development on the Project Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site or in the vicinity. There are no City or County significant ecological areas.²⁵ The Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans will occur.

²⁵ *Navigate LA, City of Los Angeles, Bureau of Engineering, Significant Ecological Areas layer:*
<http://navigatela.lacity.org/index01.cfm>

5. CULTURAL RESOURCES

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

B Sacred Lands File Search, Native American Heritage Commission, July 11, 2014.

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

Less Than Significant Impact. *State CEQA Guidelines* Section 15064.5 defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

Regulatory Setting

National Register of Historic Places

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of "exceptional importance") and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:²⁶

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

²⁶ *Title 36 Code of Federal Regulations Part 60.4.*

Physical Integrity

According to *National Register Bulletin #15*, “to be eligible for listing in the National Register, a property must not only be shown to be significant under National Register criteria, but it also must have integrity.” Integrity is defined in *National Register Bulletin #15* as “the ability of a property to convey its significance.”²⁷ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials.

Context

To be eligible for listing in the National Register, a property must also be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.”²⁸ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

California Register of Historical Places

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

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Historic resources eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. Resources less than 50 years of age may be eligible if it can be

²⁷ *National Register Bulletin #15*, pp. 44-45.

²⁸ *National Register Bulletin #15*, p. 7.

demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.²⁹

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

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [California Office of Historic Preservation (OHP)] procedures and requirements;
3. The resource is evaluated and determined by the office [OHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

State Office of Historic Preservation Survey Methodology

The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

²⁹ *Public Resources Code Section 4852.*

City of Los Angeles Cultural Heritage Ordinance

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

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

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

Determining the Significance of Impacts on Historical Resources

The State CEQA Guidelines

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

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

- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources.³⁰

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

- Demolition of a significant resource;

³⁰ 14 CCR Section 15064.5(b)(2).

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

Secretary of the Interior Standards

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

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

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

Potential Project Impacts

The Project does not involve the demolition of any historic resources. The existing buildings on the Project Site that would be demolished do not represent historic resources subject to CEQA. The applicant has been issued a demolition permit to remove the existing buildings at 926 and 932 La Brea Avenue.³¹ As such, the City has not indicated that the buildings are resources based on available information. As the Project will have a less than significant impact, no mitigation measures are required or recommended.

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

Less Than Significant with Mitigation Incorporated. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings and a vacant area. The Project would require excavation for one subterranean parking level, utility and foundation work, and grading to level the Project Site. Thus, there is the potential for buried archeological, prehistoric and historic resources within the Project Site. However, with the implementation of **Mitigation Measure 5-1**, impacts on archaeological resources would be less than significant.

Mitigation Measure

5-1 Cultural Resources (Archaeology)

- If any archaeological materials are encountered during the course of project development, all further development activity shall halt in the areas of archaeological sensitivity (excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent archaeological resources), and:

³¹ *Application for Inspection to Demolish Building or Structure, Department of Building and Safety, Issued June 17, 2014, Application # 14019-10000-01928 (for 922 N. La Brea Avenue), and Application Issued July 25, 2014, Application # 14019-10000-01929 (for 932 N. La Brea Avenue).*

- a. The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Register of Professional Archaeologists (ROPA) or a ROPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
 - b. The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
 - c. The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report.
- Project development activities may resume once copies of the archaeological survey, study or report are submitted to:

SCCIC Department of Anthropology
McCarthy Hall 477 CSU Fullerton
800 North State College Boulevard
Fullerton, CA 92834

- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

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

Less Than Significant with Mitigation Incorporated. A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings and a vacant area. The Project would require excavation for one subterranean parking level, utility and foundation work, and grading to level the Project Site. Thus, there is still the potential for buried paleontological resources within the Project Site. However, with the implementation of **Mitigation Measure 5-2**, impacts on paleontological resources will be less than significant.

Mitigation Measure

5-2 Cultural Resources (Paleontology)

- If any paleontological materials are encountered during the course of project development, all further development activities shall halt in the areas of paleontological sensitivity (excavation or disturbance may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent paleontological resources), and:

- a. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact.
 - b. The paleontologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
 - c. The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report.
 - d. Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum.
 - e. Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

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

Less Than Significant with Mitigation Incorporated. A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Native American Heritage Commission (NAHC) was contacted to conduct a Sacred Lands File (SLF) Search. A response was received on July 11, 2014 (included as Appendix B to this IS/MND). A record search of the NAHC Sacred Lands File did not indicate the presence of Native American traditional cultural places in the Project Site, based on the USGS coordinates submitted as part of the Area of Potential Effect (APE). Note that the absence of archaeological or Native American sacred places does not preclude their existence at the subsurface level. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains existing buildings and a vacant area. The Project would require excavation for one subterranean parking level, utility and foundation work, and grading to level the Project Site. Environmental impacts may result from Project implementation due to discovery of unrecorded human remains. With the implementation of **Mitigation Measure 5-3**, impacts on human remains will be less than significant.

Mitigation Measure

5-3 Cultural Resources (Human Remains)

- In the event that human remains are discovered during excavation activities, the following procedure shall be observed:
 - a. Stop immediately and contact the County Coroner:

1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
323-343-0714 (After Hours, Saturday, Sunday, and Holidays)
 - b. The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission.
 - c. The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
 - d. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
 - e. If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or;
 - f. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

6. GEOLOGY AND SOILS

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

- C-1 Geotechnical Engineering Investigation, Proposed Retail Structure, 904, 926 and 932 North La Brea Avenue, Los Angeles, California, Geotechnologies, Inc, April 1, 2014, Updated August 11, 2014.
- C-2 Supplemental Geotechnical Findings, Results of Cone Penetration Testing, Proposed Retail Structure, 904, 926 and 932 North La Brea Avenue, Los Angeles, California, Geotechnologies, Inc, May 12, 2014.
- C-3 Soils Report Approval Letter, Los Angeles Department of Building and Safety, April 23, 2014.
- C-4 Change to Project Description Letter, Geotechnologies, Inc, September 5, 2014.

A Soils Report Approval letter was issued on April 23, 2014 by the Los Angeles Department of Building and Safety. Since the issuance of the letter, the Geotechnical Report was updated on August 11 to reflect changes in the Project Description. The change was that the original Project was proposed to be at-grade commercial structure with rooftop parking and subterranean parking may be added. The current Project is a mixed use building with ground floor retail and residential on levels 2-7. Parking would be in one subterranean level and 2 above grade levels on 2 and 3. As described in the Letter issued by Geotechnologies, Inc. on September 5, 2014, the newly proposed site description does not materially change the geotechnical engineering recommendations of the April 1, 2014 report. With the exception of the revision to the anticipated building settlement, the recommendations provided in the report may be used for the newly proposed design.

- a) **Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - (i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

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

Surface Rupture

In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Act defines “active” and “potentially-active” faults using the same

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

Surface rupture is defined as surface displacement which occurs along the surface trace of the causative fault during an earthquake. Based on research of available literature, no known active or potentially active faults underlie the Project Site. The nearest such zone is located 1.25 miles to the north for the Hollywood Fault, according to the California Geological Survey's final map of the Hollywood Fault released November 6, 2014.³² The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. Based on these considerations, the potential for surface ground rupture at the Project Site is considered low.³³ Therefore, potential impacts would be less than significant.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located within a seismically active region. As with all of southern California, the primary geologic hazard at the Project Site is moderate to strong ground motion (acceleration) caused by an earthquake on any of the local or regional faults.³⁴ However, design of the Project in accordance with the provisions of the latest California Building Code and Los Angeles Building Code (implemented at the time of building permits) will mitigate the potential effects of strong ground shaking. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the Los Angeles Municipal Code (LAMC), which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk or loss or injury. Therefore, impacts related to seismic ground shaking will be less than significant.

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

Less Than Significant Impact. Liquefaction is a phenomenon in which saturated silty to cohesionless soils below the groundwater table are subject to a temporary loss of strength due to the buildup of excess

³² http://gmw.consrv.ca.gov/SHMP/download/quad/HOLLYWOOD/maps/Hollywood_EZRIM/Hollywood_EZRIM.pdf

³³ Page 7, *Geotechnical Engineering Investigation*, Geotechnologies, Inc., April 1, 2014, Updated August 11, 2014.

³⁴ Page 6, *Geotechnical Engineering Investigation*, Geotechnologies, Inc., April 1, 2014, Updated August 11, 2014.

pore pressure and cyclic loading conditions such as those induced by an earthquake. Liquefaction related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. The Seismic Hazards Map for the Hollywood 7.5 Minute Quadrangle identifies the Project Site as non-liquefiable. This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake. A Site-specific liquefaction analysis was performed (Supplemental Geotechnical Findings, Results of Cone Penetration Testing as Appendix C-2) following the Recommended Procedures for Implementation of the California Geologic Survey Special Publication 117A, Guidelines for Analyzing and Mitigating Seismic Hazards in California. According to the Seismic Hazard Zone Report (cited in Appendix C-1), the historic-high groundwater level for the Project Site was 10 feet below the ground surface. The historic high groundwater level was conservatively utilized for the liquefaction analysis. The lowest factor of safety calculated for soil layers considered susceptible to the occurrence of liquefaction is 0.53. The liquefiable layer is found at a depth of 21 to 22 feet. The liquefiable zone was calculated to settle up to 0.4 inches during the design earthquake.

Lateral spreading is the most pervasive type of liquefaction-induced ground failure. The liquefaction analysis indicates that Project Site soils are capable of liquefaction during 475 year return period ground motion. However the ground surface is inclined at an 80 to 1 gradient and there are no nearby free faces such as drainage channels. Therefore, lateral spreading is considered remote.³⁵ The differential settlement due to liquefaction is estimated to be approximately 0.3 inch. The amount of settlement can be accommodated by conventional foundations.³⁶

The City of Los Angeles ZIMAS mapping system does not classify the Project Site as liquefaction.³⁷ A Supplemental Finding as a result of three cone penetration tests (CPT) soundings re-evaluated the potential for liquefaction on the Project Site. Based on the analysis of the three CPT sounds, the Project Site is not liquefiable during the design earthquake. As a result, the Project may be designed for the static settlement only which is estimated to be 1.0 inch total and 0.5 inch differential.³⁸ Therefore, impacts with respect to ground-related failure and liquefaction will be less than significant.

(iv) Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. A landslide area is land identified

³⁵ Pages 7-10, Geotechnical Engineering Investigation, Geotechnologies, Inc., April 1, 2014, Updated August 11, 2014.

³⁶ Page 12, Geotechnical Engineering Investigation, Geotechnologies, Inc., April 1, 2014, Updated August 11, 2014.

³⁷ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 904 La Brea, website: <http://zimas.lacity.org/>.

³⁸ Pages 1-2, Supplemental Geotechnical Findings, Geotechnologies, Inc., May 12, 2014.

by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow. The probability of seismically-induced landslides occurring on the Project Site is considered to be low due to the general lack of elevation difference slope geometry across or adjacent to the Project Site.³⁹

In addition, the City of Los Angeles ZIMAS mapping system⁴⁰ and the Safety Element of the City of Los Angeles⁴¹ do not classify the Project Site as within a landslide area, or identified as a bedrock or probably bedrock landslide site. The hillside area generally includes the Hollywood Hills, north of Franklin Avenue. Small areas (5-100 acres) of bedrock landslide sites are located in central Griffith Park. Further, according to the State of California Seismic Hazards Map⁴², the Project Site is not at risk for landslides.⁴³ Therefore, no impacts due to landslides will occur.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. Demolition (removal of the existing building) and grading would expose minimal amounts of soils for a limited time, allowing for possible erosion. The entire Site is approximately 1.15 acres. However, due to the temporary nature of the soil exposure during the grading process, substantial erosion will not occur. The Project will contain one subterranean level (approximately 8 feet below grade) in addition to any other excavation typically required for foundation and utility work. Excavations up to 12 feet in vertical height will be required for the subterranean level.⁴⁴ All grading activities require grading permits from the City of Los Angeles Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Division 70, which addresses grading, excavation, and fills. During construction, the Project will be required to prevent the transport of sediments from the

³⁹ Page 11, *Geotechnical Engineering Investigation*, Geotechnologies, Inc., April 1, 2014, Updated August 11, 2014.

⁴⁰ City of Los Angeles Department of City Planning, *Zoning Information and Map Access System*, search for 904 La Brea, website: <http://zimas.lacity.org/>.

⁴¹ Los Angeles Safety Element, Exhibit C, *Landslide Inventory and Hillside Areas in the City of Los Angeles*: <http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf>, accessed May 30, 2014.

⁴² California, Department of Conservation, *Landslide Maps*: <http://www.quake.ca.gov/gmaps/WH/landslidemaps.htm>, accessed May 30, 2014.

⁴³ *Landslide Inventory Map of the Hollywood Quadrangle*, California Geological Survey, April 2013: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/lslim/LSIM_Hollywood.pdf, accessed May 30, 2014.

⁴⁴ Page 34, *Geotechnical Engineering Investigation*, Geotechnologies, Inc., April 1, 2014, Updated August 11, 2014.

Project Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs will be detailed in a Stormwater Pollution Prevention Plan (SWPPP), which is required to be acceptable to the City Engineer and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations. With the implementation of the required construction BMPs, (as described in **Mitigation Measure 6-1**) soil erosion during construction impacts will be less than significant.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The entire Project Site would be covered by the proposed structure; thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, operation impacts related to erosion or the loss of topsoil will be less than significant.

Mitigation Measure

6-1 Erosion/Grading/Short-Term Construction Impacts

- The applicant shall provide staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.
- Chapter IX, Division 70 of the Los Angeles Municipal Code addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety. Additional provisions are required for grading activities within Hillside areas. The application of BMPs includes but is not limited to the following mitigation measures:
 - a. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity.
 - b. Stockpiles, excavated, and exposed soil shall be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer.
- c) **Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. The Site is relatively level

ranging in elevation from 271 feet to 276 feet above mean sea level.⁴⁵ Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. Additionally, as discussed in the response the Question 6(a)(iii) and 6(a)(iv), the Project Site is not at risk for liquefaction or landslides. The potential for dry seismic settlement is considered negligible because the soils beneath the Project Site are saturated from a depth of 13 feet and below, and the upper 13 feet consist of fine grained cohesive soil.⁴⁶ The construction of the Project is considered feasible from a geotechnical engineering standpoint provided the advice and recommendations presented in the Geotechnical Engineering Investigation are followed and implemented during construction.⁴⁷ This is included as **Mitigation Measure 6-2**. Therefore, any potential impacts related to building loads and construction will be less than significant.

Mitigation Measure

6-2 The Project shall comply with the recommendations contained within the geotechnical Engineering Report submitted to the Department of Building and Safety.

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

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (decrease in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area.

The onsite geological materials are in the high expansion range. The Expansion Index was found to be 114 for bulk samples remolded to 90 percent of the laboratory maximum density. LADBS is not requiring reinforcing beyond the minimum required by the Building Code. However, the Geotechnical Engineering

⁴⁵ Page 2, Geotechnical Engineering Investigation, Geotechnologies, Inc., April 1, 2014, Updated August 11, 2014.

⁴⁶ Page 10, Geotechnical Engineering Investigation, Geotechnologies, Inc., April 1, 2014, Updated August 11, 2014.

⁴⁷ Page 11, Geotechnical Engineering Investigation, Geotechnologies, Inc., April 1, 2014, Updated August 11, 2014.

Investigation requires additional reinforcing as noted in the “Foundation Design” and “Slabs on Grade”⁴⁸. This is included as **Mitigation Measure 6-2** above. Therefore, any potential impacts related to expansive soils will be less than significant.

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

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

⁴⁸ Page 14, Geotechnical Engineering Investigation, Geotechnologies, Inc., April 1, 2014, Updated August 11, 2014.

7. GREENHOUSE GAS EMISSIONS

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

A Air Quality, Noise, and Greenhouse Gases Appendices, DKA Planning, September 2014.

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

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

- Carbon Dioxide (CO₂) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO₂ emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO₂ comprises over 80 percent of GHG emissions in California.⁴⁹
- Methane (CH₄) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.⁵⁰
- Nitrous Oxide (N₂O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N₂O emissions.⁵¹ N₂O emissions from motor vehicles generally occur directly from operation of vehicles.
- Hydrofluorocarbons (HFCs) are one of several high global warming potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions

⁴⁹ California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006, p. 11.

⁵⁰ United States Environmental Protection Agency, *Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003)*.

⁵¹ United States Environmental Protection Agency, *U.S. Adipic Acid and Nitric Acid N₂O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions*, December 2001.

from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.

- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.
- Sulfur Hexafluoride (SF₆) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF₆ are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.⁵² The other GHGs are less abundant but have higher GWP than CO₂. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO₂ were being emitted. High GWP gases such as HFCs, PFCs, and SF₆ are the most heat-absorbent.

Regulatory Setting

Federal

The U.S. EPA has historically not regulated GHGs because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHGs could be considered within the Clean Air Act's definition of a pollutant.⁵³ In December 2009, U.S. EPA issued an endangerment finding for GHGs under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and U.S. EPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon.

State

California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 was enacted in September 2003 and requires regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by vehicles used for personal transportation. On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The

⁵² *California Air Resources Board, Climate Change Emission Control Regulations, 2004*

⁵³ *Massachusetts v. Environmental Protection Agency et al (127 S. Ct. 1438 (2007))*

California Environmental Protection Agency formed a Climate Action Team that recommended strategies that can be implemented by State agencies to meet GHG targets.

In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. A companion bill, Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission 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.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, CARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.⁵⁴ On October 25, 2007, CARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emissions from the non-electricity sector. CARB determined that the total statewide aggregated GHG 1990 emissions level and 2020 emissions limit is 427 million metric tons of CO₂e. The 2020 target reductions are currently estimated to be 169 million metric tons of CO₂e.

CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by CARB in coordination with the CAT, was first published in October 2008 (the “2008 Scoping Plan”). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state’s dependence on oil, diversify the state’s energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the state’s emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California’s clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. As required by AB 32, CARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future. In order to assess the scope of reductions needed to return to 1990 emissions levels, CARB first estimated the 2020 business-as-usual (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that

⁵⁴California Air Resources Board, *Proposed Early Action Measures to Mitigate Climate Change in California*, April 20, 2007.

would be expected to result if there were no GHG emissions reduction measures, and if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 169 million metric tons (an approximately 30 percent reduction) by 2020.

The 2008 Scoping Plan attributes only eight percent of the 2020 predicted GHG emissions inventory to the commercial and residential sector, and allocates only relatively minimal GHG emission reduction obligations to the land use sector (CARB 2008). The only measure particularly aimed at the land use sector—regional transportation-related GHG emissions targets—sets a 5 million metric ton (“MMT”) CO₂e goal, which represents less than three percent of the 169 MMT CO₂E necessary reductions under AB 32. On August 19, 2011, following legal action in opposition to the Scoping Plan, CARB updated the Scoping Plan through a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).⁵⁵ CARB’s updated projected BAU GHG emissions in the 2011 Scoping Plan are based on current economic forecasts (i.e., as influenced by the economic downturn) and certain GHG emissions reduction measures already in place. The BAU projection for 2020 GHG emissions in California was originally estimated to be 596 MMTCO₂e. The updated calculation of the 2011 Scoping Plan’s estimates for projected GHG emissions in 2020, as of October 2010 based on current economic forecasts, totals 506.8 MMTCO₂e (or approximately 507 MMTCO₂e).

On May 22, 2014, CARB approved the first update to the Scoping Plan. The first update to the Scoping Plan recalculates the 1990 GHG emissions level to be 431 million metric tons. The update further estimates that while the state’s emission inventory would need to decline one percent per year to reach the 2020 targets, a 5.2 percent annual decline would be needed from 2020 to 2050 to meet the 2050 carbon budgets.

CARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO₂ per year and make up 94 percent of the point source CO₂ emissions in California. In response to SB 97, the Governor’s Office of Planning and Research (OPR) adopted CEQA guidelines that became effective on March 18, 2010.⁵⁶ The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;

⁵⁵ California Air Resources Board, *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011.*

⁵⁶ California Air Resources Board, *CEQA Guidelines Rulemaking Summary.* <http://resources.ca.gov/ceqa/guidelines/>

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

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve greenhouse gas emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.⁵⁷

On October 24, 2008, CARB published draft guidance for setting interim GHG significance thresholds. This was the first step toward developing the recommended Statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). CARB believes that thresholds in these sectors will advance climate objectives, streamline project review, and encourage in CEQA analyses of GHG emissions throughout the State.

⁵⁷American Planning Association, *California Chapter*, Analysis of SB 375, <http://www.calapa.org/-en/cms/?2841>, accessed March 30, 2009.

Regional

The SCAQMD convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group include government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency.⁵⁸ The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. This analysis relies on the BAU approach. AB 32 called for the state to achieve 1990 levels of GHG emissions by 2020 and numerically that equates to a 28.4 percent reduction in GHG emissions. In 2011, The Functional Equivalent Document (FED) was released, where the GHG emissions threshold was revised due to prolonged economic downturn and inclusion of estimated regulation-based reduction.⁵⁹ Based on this document, the State would achieve 1990 levels of GHG emissions by 2020 with 21.7 percent reduction in GHG emissions. Therefore, a project that is able to demonstrate a 21.7 percent reduction in GHG emissions as compared to the BAU scenario would be considered consistent with AB 32 and the State's goal of achieving 1990 GHG emission levels by the year 2020.

Local

The City of Los Angeles has adopted its LA Green Plan that outlines goals and actions to reduce the generation of GHGs to 35 percent below 1990 levels. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos. The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development. To assess the Project's consistency with AB 32 emission reduction targets, this analysis includes potential emissions under two scenarios. First, a BAU scenario was developed that is based on historic trends across economic sectors and represents emissions in the absence of GHG emissions reduction measures (e.g., AB 1493 standards for vehicles, the California Low Carbon Fuel Standard, full implementation of the Renewables Portfolio Standard). Second, an "As Proposed" scenario was developed that includes Project design features and implementation of state mandates that reduce GHG emissions across economic sectors. This also includes the January 2011 revisions to Title 24 commonly known as the California Green Building Standards Code, as well as the California Low Carbon Fuel Standard, and tailpipe standards in AB 1493 (Pavley).

⁵⁸ SCAQMD, *Greenhouse Gases*: <http://www.aqmd.gov/ceqa/handbook/GHG/GHG.html>

⁵⁹ California Air Resources Board, *Status of Scoping Plan Recommended Measures*, July 25, 2011. Available at http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf. Accessed: March, 2014.

Project Impacts

Construction

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. These impacts would vary day to day over the 20-month duration of construction activities.⁶⁰ As illustrated in Table 3.7-1, Estimated Construction Emissions – Mitigated, construction emissions of CO₂ would peak in 2016, when up to 27,547 pounds of CO₂e per day are anticipated primarily during the grading phase.

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen). To address the State’s Green Building Strategy, **Mitigation Measure 7-1** is recommended to minimize GHG emissions associated with VOC sources. Impacts associated with GHG emissions will be less than significant and proposed mitigation will help minimize impacts.

Mitigation Measure

7-1 Greenhouse Gas Emissions

Only low- and non-VOC-containing paints, sealants, adhesives, and solvents shall be utilized in the construction of the project.

**Table 3.7-1
Estimated Construction Emissions - Mitigated**

Construction Year	CO ₂	CH ₄	N ₂ O	CO ₂ e
2016	51,902	4	0	27,547
2017	24,438	4	0	24,518
<i>Pounds per day</i>				
<i>Source: DKA Planning, 2014 based on CalEEMod 2013.2.2. Data in Appendix A to this IS/MND.</i>				

Operation

Greenhouse gas emissions were calculated for long-term area source and motor vehicle operations. As shown in Table 3.7-2, the Project would emit 4,427 metric tons of CO₂e per year during typical operations. Pursuant to guidance from the State’s CEQA Guidelines updates under SB 97, the Project’s contribution to global climate change is not “cumulatively considerable” and is considered less than

⁶⁰ Construction includes approximately (estimate) 18 months for core construction and 2 months for tenant improvements.

significant. Further, this represents a 23 percent reduction in CO₂e emissions from a Business-As-Usual scenario. Based on these results, the Project meets the reduction target as a numeric threshold (21.7 percent) set forth in the Revised AB 32 Scoping Plan (FED). The Project is consistent with the State’s AB 32 Scoping Plan objectives for reducing community-based emissions.

**Table 3.7-2
Estimated Annual CO₂e Greenhouse Gas Emissions**

Scenario and Source	Business as Usual ¹	As Proposed Scenario ²	Reduction From Business As Usual Scenario	Change from Business As Usual Scenario
Area Sources	3	3	-	0%
Energy Sources	1,040	733	-308	-30%
Mobile Sources	4,302	3,315	-988	-23%
Waste Sources	54	54	-	0%
Water Sources	173	173	-	0%
Construction	152	152	-	0%
Total Emissions	5,722	4,427	-1,295	-23%

Metric tons per year

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

¹ BAU scenario does not assume 30% reduction in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State’s renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).

² To ensure a conservative analysis that focuses on the proposed project’s gross impact on climate change, the “As Proposed” scenario does not discount emissions from existing development on the project site.

Source: DKA Planning, 2014. Data in Appendix A to this IS/MND.

The Project’s reduction is beyond the estimated 21.7 percent reduction in GHG emissions as compared to the BAU scenario. The “As Proposed” scenario includes Project design features and implementation of state mandates that reduce GHG emissions across economic sectors. This also includes the January 2011 revisions to Title 24, the California Low Carbon Fuel Standard, and tailpipe standards in AB 1493 (Pavley). In contrast, the BAU scenario is based on historic trends across economic sectors and represents emissions in the absence of GHG emissions reduction measures (e.g., AB 1493 standards for vehicles, the California Low Carbon Fuel Standard, full implementation of the Renewables Portfolio Standard). Ultimately, the Project is consistent with the State’s AB 32 Scoping Plan objectives for reducing community-based emissions.

The Project will comply with the City of Los Angeles' Green Building Ordinance standards reduce emissions beyond a "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development. The City's checklist, set forth below, (combination of mandatory items, voluntary CalGreen Tier 1 items, and voluntary CalGreen Tier 2 items) for newly constructed non-residential (and high rise residential) buildings is part of LAMC Section 99.12.508:⁶¹

1. **GHG Emissions Associated with Planning and Design.** The Project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings.
2. **GHG Emissions Associated with Energy Demand.** The Project must meet Title 24 2008 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities.
3. **GHG Emissions Associated with Water Use.** The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use.
4. **GHG Emissions Associated with Solid Waste Generation.** The Project is subject to construction waste reduction of at least 50 percent. In addition, project site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.
5. **GHG Emissions Associated with Environmental Quality.** The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities.

The Project is an infill development that reuses a developed site and increases the density (FAR) from approximately 0.33:1 to approximately 3:1. Thus, the Project provides a more efficient use of the land per

⁶¹ LAMC Section 99,12.508:

[http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles_ca_mc](http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc)

acre, especially in an area with transit opportunities. There would be bicycle parking, a Low Impact Development plan (LID) for runoff potential, and all vehicle parking will be on-site in an integrated garage. The lighting will be designed to reduce light pollution and intrusion to the nearby residential area. The Project Site is within a transit corridor on La Brea Avenue and Santa Monica Boulevard. The Project would meet Title 24 energy standards and all City of Los Angeles Green Building Codes. This would reduce water usage through efficient fixtures. Landscaping is expected to be minimal given the size constraints at ground level. Demolition, construction, and operation will recycle materials to the extent feasible.

In addition to the GHG emission reductions described above, it is important to note that the CO₂ estimates from mobile sources (particularly CO₂, CH₄, and N₂O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

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

It is impossible to know at this time whether residents, employees, and visitors of the proposed Project would have longer or shorter trips relative to their destinations; whether they would walk, bike, and use public transportation more or less than under existing circumstances; and whether their overall driving habits would result in higher or lower VMT. Much of the vehicle-generated CO₂ emissions attributed to the Project could simply be from vehicles at an existing location moving to the Project Site, and not from new vehicle emissions sources relative to global climate change. Therefore, although it is not possible to calculate the net contribution of vehicle-generated CO₂, CH₄, and N₂O emissions from the Project (i.e., project generated emissions minus current emissions from vehicles that would move to the Project Site), the net contribution would likely be much less than the estimated emissions.

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

Less Than Significant Impact. The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. However, the AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. As a result, the Project is judged against its consistency with the AB 32 Scoping Plan. Further, this analysis discloses short- and long-term emissions of greenhouse gases, discloses project elements that will reduce the carbon footprint of the Project to determine whether it will result in adverse cumulative impacts to global climate change. As shown in Table 3.7-3, the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan. As a result, the Project is considered consistent with the State and City’s climate action plans and impacts are less than significant.

**Table 3.7-3
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies**

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

**Table 3.7-3
Project Consistency with AB 32 Scoping Plan
Greenhouse Gas Emission Reduction Strategies**

Strategy	Project Consistency
of shore power for ships at berth. Improve efficiency in goods movement activities.	implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California’s existing solar programs.	Neutral. The Project may or may not include solar roofs.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	Not Applicable. State agencies are responsible for implementing efficiency measures.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	Not Applicable. This measure addresses industrial facilities. The Project is not an industrial facility.
High Speed Rail. Support implementation of a high speed rail system.	Not Applicable. This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings.	Consistent. The Project will be compliant with the City’s Green Building Ordinance, and would incorporate water saving features and energy efficient features into its design.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	Not Applicable. State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	Consistent. Under City of Los Angeles requirements, the Project would divert/recycle at least 50% of construction debris, re-use existing materials in new construction, use recycled content materials; and recycle during operation.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	Not Applicable. Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. The Project will be compliant with the City’s Green Building Ordinance, would incorporate water saving features and energy efficient fixtures into its design.
Agriculture. In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	Not Applicable. The Project does not include agricultural facilities.
<i>Source: DKA Planning, 2014.</i>	

8. HAZARDS AND HAZARDOUS MATERIALS

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

- D-1 Phase I Environmental Site Assessment 904 N. La Brea Avenue, TOR Environmental, Inc., November 25, 2013, Revised July 23, 2014.
- D-2 Phase I Environmental Site Assessment 926 and 932 N. La Brea Avenue, TOR Environmental, Inc., November 20, 2013, Revised August 25, 2014.
- D-3 Comprehensive Asbestos Survey Report, 900-932 N. La Brea Avenue, ENV America Inc., April 30, 2014.
- D-4 Lead Survey Report, 900-932 N. La Brea Avenue, ENV America Inc., April 29, 2014.
- D-5 Methane Test Data, GeoKinetics, October 6, 2014.

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

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

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

Similarly, from an operational perspective, the Project does not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of residential and retail uses. These typical urban uses do not involve the routine use of hazardous materials. Instead, the operation of the

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

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

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

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

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

Site Reconnaissance

The southern half of the Project Site (900-904) is vacant land. The north half of the Project Site (926-932) is occupied with two buildings built in 1929 and 1941, which are used as storage for studio-related uses with ancillary support office. The visual observations for both the northern and southern halves of the Project Site from TOR Environmental are noted in Table 3.8-1, Site Reconnaissance.

**Table 3.8-1
Site Reconnaissance**

Feature/Characteristic	Y/N	Comments
Current Use of Site	Y	The northern half is occupied by two buildings used as storage for studio-related equipment with ancillary support office.
Vacant Spaces / Undeveloped Areas / Wetlands	Y	The southern half is vacant land. Previous structures have been demolished.
Landscaping (potential pesticide use)	N	Negligible landscaping onsite. The northern half of the Project Site is covered with buildings or is paved. The southern half is vacant.
Parking Lots / Structures (potential for vapor intrusion or chemical spills)	Y	Small surface parking lots are paved with concrete and asphalt.
Concrete pads (associated with electrical systems or large machinery)	Y	Various concrete pads and patches visible throughout the Project Site, typical of old commercial/industrial sites.
Former Pump Islands	N	None visible.
Fill Ports (small manholes associated with USTs)	N	None visible.
Vent Pipes (associated with USTs)	N	None visible.
Former Building Foundations	N	None visible.
Drums and Containers	Y	Drums of various chemicals were observed near the Project Site. No leaking drums were noted during the Project Site visit.
Sumps	N	No current sumps identified.
Clarifier	N	No current clarifiers identified.
Hoists or Lifts (often associated with hydraulic fluids & auto repair)	N	None identified.
Concrete / Asphalt patches	Y	Various patches indicative of previous exploratory soil boreholes and related to the currently operating groundwater extraction system.
Monitor/Supply/Disposal Wells	N	Four groundwater monitoring/extractions wells were found on the northern half and three wells on the southern half.
Aboveground Storage Tanks (ASTs)	N	None identified.
Underground Storage Tanks (USTs)	N	No current USTs observed or reported.
Hazardous Chemicals (Storage, Use, Disposal)	Y	Hazardous chemicals associated with lighting manufacturing. No current releases observed.
Petroleum Hydrocarbons	Y	Incidental quantities noted onsite.
Pesticide Usage or Storage	Y	Typical small quantity pesticide use noted.
Unlabeled Containers/Substances	N	None noted
Solid Waste Storage (i.e. bins)	Y	Municipal waste stored in typical bins.
Septic Tanks	N	-
Berms (potential secondary containment)	N	-
Waste Water Generation	Y	Groundwater extraction system currently discharges adjacent to the Project Site at a permitted point of discharge to the sanitary sewer system.
Pits, Ponds, Lagoons	N	-

**Table 3.8-1
Site Reconnaissance**

Feature/Characteristic	Y/N	Comments
Pools Of Liquid	N	-
Floor Drains	Y	Various floor drains noted onsite (northern portion). Southern half is vacant.
Drainage Systems (i.e. ditches)	N	-
Dumping or Filling Activities (i.e. soil or debris piles)	N	-
Roads And Trails With No Apparent Purpose (potential for illicit dumping)	N	-
Materials Spills	N	No active spills noted.
Unusually Stained or Corroded Pavement or Flooring	N	De minimis surface staining only.
Odors	N	-
Air Emissions	N	-
Interior water damage / mold (potential pathway for impacts)	N	None noted
Stained Or Disturbed Soil	N	-
Stressed Vegetation	N	-
Electrical Transformers (PCBs)	Y	Various transformers noted onsite. No leaking transformers noted.
Florescent Lighting (PCBs)	Y	Typical florescent lighting fixtures.
Suspect Asbestos-Building Materials	-	Not within scope. (Note there is a separate asbestos survey, discussed below).
Water damage / Mold	N	None noted.
Suspect Lead-Based Paint	-	Not within scope. (Note there is a separate lead survey, discussed below).
Fiber optics lines	N	-
Heating Systems (associated with heating oil, gas, electric or steam radiators)	N	-
High Voltage Power Lines/Magnetic Fields	N	-
Cellular Phone Tower	N	-
Neighboring Dry Cleaners	N	None noted.
Neighboring Property USTs	Y	Seven USTs identified as the source of soil and groundwater impact extending beneath the Project Site and beyond are located northeast and east of the Project Site on the Mole Richardson property at 953 Sycamore Avenue.
Any sites NOT listed in EDR? Incorrect addresses?	N	-
<p><i>Sources: Pages 28-30, Phase I Environmental Site Assessment, 904, TOR Environmental, Inc., November 27, 2013, Revised July 23, 2014.</i> <i>Pages 29-31, Phase I Environmental Site Assessment, 926 and 932, TOR Environmental, Inc., November 20, 2013, Revised August 25, 2014.</i> <i>Table: CAJA Environmental Services, August 2014.</i></p>		

Historic Materials of Concern

Suspect Asbestos-Containing Materials

The onsite structures in the northern half were initially constructed before 1979. Due to their age, there is a potential for asbestos-containing materials (ACM) to be present.⁶² There are no structures on the southern half. As asbestos survey was prepared in April 2014. Table 3.8-2, Asbestos Survey, lists the material type, percent asbestos, and friability for each confirmed and assumed ACM identified in the buildings on the Project Site. Bulk sampling and laboratory analysis indicated that asbestos-containing materials are present in the buildings. Areas that required demolition to access were not accessed. Suspect or confirmed asbestos-containing materials may be located in areas such as above hard lid ceilings, inside of wall chases or cavities, or below well-adhered carpeting. Prior to demolition, the materials to be disturbed that were not observed or sampled should be evaluated and additional sampling performed prior to disturbance. The identified or assumed ACM are required to be removed by a California Licensed Asbestos Abatement Contractor prior to demolition. The following federal, state, and local regulations require that any identified ACM that will be disturbed by renovation activities shall be removed from the building prior to demolition or renovation and that written notification be provided to contractors and other effected parties.

1. The Federal National Emissions Standards for Hazardous Air Pollutants (NESHAP) for building demolition and renovation applies to facilities that contain more than 260 linear feet or 160 square feet and requires that asbestos-containing building materials be removed prior to demolition or renovation.
2. The California Health and Safety Code Chapter 10.4 requires that any owner of a commercial or industrial building provide written notice to their employees, tenants and contractors about the presence of asbestos in the building within 15 days of receipt of such knowledge. Any contractor that receives such notice is required to provide a copy to each of its employees.
3. South Coast Air Quality Management District Rule 1403 requires written notification 10 working days prior to the demolition of any structure and that all friable and non-friable asbestos-containing building materials be removed prior to demolition by a State of California licensed Asbestos Abatement Contractor.⁶³

Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. However, with

⁶² Page 32, *Phase I Environmental Site Assessment, 926 and 932, TOR Environmental, Inc., November 20, 2013, Revised August 25, 2014.*

⁶³ Pages 1-3, 23, *Comprehensive Asbestos Survey Report, ENV America Inc., April 30, 2014.*

compliance with the federal (NESHAP), state (California Health Code Chapter 10.4), and local regulations (SCAQMD Rule 1403) for ACM, the impact would be reduced to less than significance.

**Table 3.8-2
Asbestos Survey**

Material Type	Percent Asbestos	Friable
900/904 N. La Brea Avenue		
Vacant, no buildings		
922 N. La Brea Avenue		
Roof Mastic	55 Chrysotile	No
Fire Doors	Assumed ¹	No
932 N. La Brea Avenue NW Building		
9” White Floor Tile/Mastic #1	Tile-3% Chrysotile Mastic-None Detected	No
9” Black Floor Tile/Mastic #1	Tile-5% Chrysotile Mastic-3% Chrysotile	No
9” Grey Floor Tile/Mastic (Top Layer)	Tile-2% Chrysotile Mastic-3% Chrysotile	No
9” Black Floor Tile/Mastic #2 (Bottom Layer)	Tile-5% Chrysotile	No
9” White Floor Tile/Mastic	Tile-Trace Chrysotile Mastic-Trace Chrysotile	No
Wall Mastic	7% Chrysotile	No
White Base Cove Mastic	Trace Anthophyllite	No
Roof Mastic	5% Chrysotile	No
932 N. La Brea Avenue N middle Building		
12” Blue Floor Tile/Mastic	Tile-None Detected Mastic-Trace Chrysotile	No
9” Grey w/Black and White Spots Floor Tile/Mastic	Tile-5% Chrysotile Mastic-3% Chrysotile	No
9” Floor Tile/Mastic	Tile-2% Chrysotile Mastic-None Detected ¹	No
Exterior Window Putty	2% Chrysotile	No
Corrugated Duct Insulation	55% Chrysotile	Yes
Duct Tape	55% Chrysotile	Yes
Roof Mastic	5% Chrysotile	No
Transite Vent Pipe	Assumed ²	No
932 N. La Brea Avenue NE Building		
9” Black Floor Tile/Mastic	Tile-5% Chrysotile Mastic-3% Chrysotile	No
Roof Mastic	5% Chrysotile	No
932 N. La Brea Avenue S Building		
Window Putty	2% Chrysotile	No
Corrugated Duct Insulation	55% Chrysotile	Yes
Duct Tape	55% Chrysotile	Yes

Roof Mastic	5% Chrysotile	No
Transite Vent Pipe	Assumed ²	No

Note 1: ENV America was only able to access the flooring under the carpet at the edge by the door. It is recommended that additional sampling of the floor be performed after the building is vacated so that it can be confirmed if the mastic contains asbestos.

Note 2: This material could not be sampled because it could not be accessed.

Source: Pages 2-4, Comprehensive Asbestos Survey Report, 900-932, ENV America Inc., April 30, 2014.
 Table: CAJA Environmental Services, July 2014.

Lead-based Paint

The onsite structures in the northern half were initially constructed before 1978. Due to their age, there is a potential for lead-based paint to be present.⁶⁴ There are no structures on the southern half. A lead survey was prepared in April 2014. Table 3.8-3, Lead Survey, lists the component, paint color, substrate, and XRF reading (Innov-X X-Ray Fluorescence Spectrum Analyzer is used to perform the lead testing) for each lead based paint/material identified in the building on the Project Site. A total of 242 representative test readings were taken from the structures. XRF results revealed the presence of lead in quantities greater than or equal to 0.7 mg/cm² in 69 of the tests.⁶⁵ Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. However, these impacts can be mitigated to a less than significant level by **Mitigation Measure 8-1**.

**Table 3.8-3
Lead Survey**

Component	Color	Substrate	XRF Reading (mg/cm ²)
900/904 N. La Brea Avenue			
Vacant, no buildings			
922 N. La Brea Avenue			
Door Frame	Grey	Wood	3.39
Door Frame	White	Wood	5
Fire Door	Grey	Metal	4.77
932 N. La Brea Avenue NW Building			
Baseboard	White	Wood	5
Crown Molding	White	Wood	2.4
Door	Grey	Wood	1.74
Door	White	Wood	5
Door Frame	Grey	Wood	5
Door Frame	White	Wood	1.75-5

⁶⁴ Page 32, Phase I Environmental Site Assessment, 926 and 932, TOR Environmental, Inc., November 20, 2013, Revised August 25, 2014.

⁶⁵ Pages 1, 7, Lead Survey Report, ENV America Inc., April 29, 2014.

**Table 3.8-3
Lead Survey**

Component	Color	Substrate	XRF Reading (mg/cm ²)
Interior Window	White	Metal	1.42
Exterior Window	White	Metal	4-5
932 N. La Brea Avenue North middle Building			
Exterior Window Sill	Grey	Wood	0.87
Exterior Stair Stringer	Grey	Metal	1.96
Exterior Stair Rail	Red	Metal	0.89
932 N. La Brea Avenue NE Building			
Bollard	Yellow	Metal	0.7
Door	Green	Wood	1.72
Exterior Door	Grey	Metal	1.53
Door	Grey	Wood	1.76
Door Frame	Beige	Metal	0.81
Door Frame	Green	Metal	0.93-1/89
Door Frame	Grey	Metal	4.49
Door Frame	White	Metal	1.7
Double Door	Green	Wood	2.61
Exterior Double Door	Grey	Wood	2.82
Double Door Frame	Green	Wood	2.81
Floor	Brown	Concrete	0.7
Steps	Green	Concrete	0.7
Ceiling/Wall	Beige	Plaster	1.05
Wall	Black	Plaster	2/08
Wall	Brown	Block	0.7
Ceiling/Wall	Brown	Plaster	0.89
Ceiling/Wall	Green	Plaster	0.73-3/49
Ceiling/Wall	White	Plaster	0.7
Window	Brown	Wood	5
932 N. La Brea Avenue S Building			
Exterior Stair Stringer	Grey	Metal	1.62
Exterior Stair Rail	Grey	Metal	2.03
Exterior Rollup Door Frame	White	Wood	0.72
Bollard	Yellow	Metal	0.7
Exterior Door Frame	White	Wood	0.7
<i>Source: Pages 1-3, Lead Survey Report, ENV America Inc., April 29, 2014. Table: CAJA Environmental Services, July 2014.</i>			

PCB Equipment

Polychlorinated biphenyls (PCBs) were historically used as coolants and lubricants in transformers, capacitors, and other electrical equipment beginning in 1929 because they do not burn easily and serve as a good insulating material. Due to the age of the onsite structures, there is the potential that fluorescent light ballasts in fixtures contain PCBs. The ballasts do not represent a REC, but should be handled in accordance with applicable regulations upon demolition or renovation. Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well

as area residents, employees, and future occupants. However, these impacts can be mitigated to a less than significant level by **Mitigation Measure 8-2**.

Radon

The Federal Environmental Protection Agency put Zip Code 90038 in Radon Zone 2 (indoor air average level from 2 to 4 pCi/L). Sixty-three federal tests of radon in 1st floor living areas within Los Angeles County revealed an average concentration of 0.711 pCi/L with neither of two tests above 4 pCi/L in zip code 90038. This information is not specific to the Project Site and site specific testing would be required to evaluate any risk from radon. If radon is tested above the threshold, it will be made compliant with federal, state, and local regulations for radon. Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. This can be mitigated to a less than significant level by **Mitigation Measure 8-3**.

Mold

TOR did not observe visible evidence of water intrusion or mold growth during the site visit; however, there is the possibility for mold to be present in the onsite structures, especially inaccessible interiors of the building structure. TOR did not (i) perform a mold/fungi inspection, (ii) perform any building material surface mold sampling, or (iii) perform air sampling for mold spores at the Project Site as part of Phase I ESA. The property is developed and includes air conditioner and refrigeration facilities that are sometimes responsible for mold development. Any maintenance, renovation, or construction activities involving the structures should include inspections for mold development prior to initiation. Employee complaints or observations in this regard should also be investigated and appropriately mitigated for the protection of human health. Exposure to such materials during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. This can be mitigated to a less than significant level by **Mitigation Measure 8-4**.

Conclusion of the Phase I ESA

Recognized Environmental Conditions (RECs)

The Phase I for both the southern half and northern half has revealed no evidence of “*recognized environmental conditions*” (*REC*) (as that term is defined in ASTM Standard Practice E1527-05) in connection with the Project Site with the exception of the following:

- **Adjacent Mole Richardson Release Site at 937 N. Sycamore:** The Mole Richardson Property is a lighting manufacturing facility that has an open Spills, Leaks, Incidents and Releases (SLIC) File with the Los Angeles Regional Water Quality Control Board (LARWQCB). The site is an open case due to the historical release of volatile organic solvents and petroleum hydrocarbons to the subsurface from sources including seven underground storage tanks (USTs) located to the northeast (upgradient)

of the Project Site. Based on a study conducted by RSI in 2010, TPH and VOCs originating from the USTs to the northeast of the Project Site has impacted the groundwater as far as ¼ mile southwest of the USTs. The contaminants migrating from the Mole-Richardson Site represent a *REC* to the Project Site.⁶⁶

Historical Recognized Environmental Conditions (HRECs)

An *HREC* is an environmental condition which in the past would have been considered a *recognized environmental condition*, but which may or may not be considered a *recognized environmental condition* currently. The Phase I for both the southern half and northern half has revealed no evidence of HRECs in connection with the Project Site, with the exception of the following:

- **Historical Uses of Concern and Chemical Impact 904 N. La Brea:** Historical research indicates that uses of concern at the Project Site parcel at 904 N. La Brea include a commercial dry cleaner operated by Moderncraft Laundry Company in 1950 and a body shop in 1969. Sampling conducted by Remediation Services Incorporated (RSI) on the Project Site in 2010 did not identify evidence of soil impact above applicable screening levels above the area influenced by groundwater. Based on groundwater sampling conducted onsite by RSI in 2010, PCE in groundwater exceeds the PCE Maximum Contaminant Level (MCL) of 5 µg/L. Previous environmental investigations indicated that the identified VOCs have migrated from an offsite upgradient source (Mole Richardson). Based on available data, the historical use of the site as a commercial dry cleaner and body shop represents an *HREC* that is not a *REC*.⁶⁷
- **Historical Uses of Concern:** Historical research indicates that uses of concern at the Project Site parcel at 932 N. La Brea include a photo laboratory with film developing from 1933 through 1969. Sampling conducted by Remediation Services Incorporated (RSI) on the Project Site in 2010 did not identify evidence of soil impact above the area influenced by groundwater. Based on groundwater sampling conducted onsite by RSI in 2010, PCE in groundwater exceeds the PCE Maximum Contaminant Level (MCL) of 5 µg/L. Previous environmental investigations indicated that the identified VOCs have migrated from an offsite upgradient source (Mole Richardson). Based on the available data, the historical use of the site as a photo laboratory represents an *HREC* that is not a *REC*.⁶⁸

⁶⁶ Pages 32-33, *Phase I Environmental Site Assessment, 904*, TOR Environmental, Inc., November 27, 2013, Revised July 23, 2014.

⁶⁷ Pages 32-33, *Phase I Environmental Site Assessment, 904*, TOR Environmental, Inc., November 27, 2013, Revised July 23, 2014.

⁶⁸ Pages 33-34, *Phase I Environmental Site Assessment, 926 and 932*, TOR Environmental, Inc., November 20, 2013, Revised August 25, 2014.

Notable Findings

Findings that are not *RECs* or *HRECs*, but do have some potential to have affected the Project Site are identified as *Notable Findings*. The Phase I for both the southern half and northern half has revealed the following *Notable Findings*:

- **Former Onsite Groundwater Monitoring/Extraction Wells:** In November 2013 Mole Richardson maintained and monitored three groundwater-monitoring wells on the Project Site's 904 La Brea Avenue portion. These wells are part of a pump and treat remediation system that Mole Richardson operated to minimize downgradient migration of contaminants originating from the Mole Richardson Property. As of July 2014, these monitoring wells were abandoned in accordance with County of Los Angeles requirements.⁶⁹
- **Onsite Groundwater Monitoring/Extraction Wells:** Mole Richardson currently maintains and monitors four groundwater-monitoring wells on the 926/932 La Brea Avenue portion. These wells also are part of a pump and treat remediation system that Mole Richardson operates to minimize downgradient migration of contaminants originating from the Mole Richardson Property.⁷⁰

Los Angeles City Methane Buffer Zone: The Project Site is located within a "Methane Buffer Zone" as defined by Los Angeles City Ordinance No. 175790. Due to its location within a Methane Buffer Zone, the ordinance requires methane testing and potential methane gas mitigation system design and installation upon redevelopment. Methane testing was conducted on October 6, 2014 (see Appendix D-5 of this IS/MND). The Project Site has a design methane concentration of 233,000 parts per million in volume (ppmv), design methane pressure of ≤ 2 inches of water column, and is in Methane Design Level V. When a site has these characteristics, mitigation requirements (passive, active, and miscellaneous systems) for methane buffer zone are required. These are included as **Mitigation Measure 8-6**. Therefore impacts are less than significant.

Recommendation

Since development plans include excavation for one subterranean level, conditioning and compaction of soils throughout the Project Site, it is likely that onsite historical sources of concern (contaminated soils from surface releases of chemicals of potential concern [COPCs], abandoned tanks, sumps, piping or other appurtenances), if present, will be encountered during this redevelopment activity. Site grading should be conducted under a Soils Management Plan that includes appropriate segregation and management of soils impacted with COPCs so as to minimize delays and protect site workers, neighbors and the environment. Any modification of onsite groundwater monitoring wells associated with the

⁶⁹ Pages 32-33, Phase I Environmental Site Assessment, 904, TOR Environmental, Inc., November 27, 2013 Revised July 23, 2014.

⁷⁰ Pages 33-34, Phase I Environmental Site Assessment, 926 and 932, TOR Environmental, Inc., November 20, 2013, Revised August 25, 2014.

upgradient Mole Richardson SLIC case should be coordinated with Mole Richardson and the LARWQCB. An assessment of exposure pathways such as direct contact and vapor inhalation is recommended to evaluate the impact of soil, soil gas and groundwater COPCs to current and potential future site occupants. This is included as **Mitigation Measure 8-5**. Thus, impacts would be less than significant with implementation of the mitigation measure.

Mitigation Measures

8-1 Lead Based Paint

- Prior to demolition activities, a review of building components known to contain lead-based paint shall be assessed to confirm if they remain intact. If the lead-based painted components will be removed, waste characterization testing shall be performed to determine if the components are required to be disposed of as hazardous waste.
- If the waste characterization indicates that any components are not hazardous waste, these components may be disposed of as construction debris as long as the paint is maintained in good and tightly adhered condition. However, if the demolition or renovation activities require sanding, grinding, or torch cutting of these paints, then the lead-based paint is required to be removed prior to these activities.
- All contractors shall be informed of all locations of lead-based paint, whether in good or poor condition, prior to the start of any work within the interior or exterior of the building.

8-2 Explosion/Release (Polychlorinated Biphenyl)

- Prior to demolition activities, a polychlorinated biphenyl (PCB) abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.

8-3 Radon

- Prior to demolition activities, specific testing would be required to evaluate any risk from radon. If radon is tested above the threshold, it shall be made compliant with federal, state, and local regulations for radon.

8-4 Mold

- Prior to demolition activities, a mold inspection contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing mold removal and disposal.

8-5 Chemicals of Potential Concern

- Site grading shall be conducted under a Soils Management Plan that includes appropriate segregation and management of soils impacted with chemicals of potential concern (COPCs) so as to minimize delays and protect site workers, neighbors and the environment.
- Any modification of onsite groundwater monitoring wells on the 926/932 La Brea Avenue portion associated with the upgradient Mole Richardson SLIC case shall be coordinated with Mole Richardson and the LARWQCB.
- An assessment of exposure pathways such as direct contact and vapor inhalation is recommended to evaluate the impact of soil, soil gas and groundwater COPCs to current and potential future site occupants.

8-6 Methane

The Project shall comply with the Mitigation Requirements for Methane Buffer Zone Level V, established in Table 1-B of Methane Test Data, GeoKinetics, October 6, 2014. This includes:

- Passive System
 - Dewatering System
 - Perforated Horizontal Pipes
 - 4-inch Gravel Blanket Thickness Under Impervious Membrane
 - 4-inch Gravel Thickness Surrounding Perforated Horizontal Piles
 - Vent Risers
 - Impervious Membrane
- Active System
 - Mechanical Extraction System capable of providing an equivalent of a complete change of air 20 minutes of the total volume of the Gravel Blanket.
 - Gas Detection System
 - Alarm System
 - Control Pad

- Miscellaneous System
 - Trench Dam
 - Conduit or Cable Seat Fitting
 - Additional Vent Risers (the total quantity of the installed vent risers shall be increased to twice the rate for the Passive System.

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

Less Than Significant Impact. A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile (1,325 feet) of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The Project Site is in close proximity to the following schools:⁷¹

- Cheder of Los Angeles, located at 801 N. La Brea Avenue, approximately 550 feet southwest.
- Melrose Elementary, located at 731 Detroit Street, approximately 850 feet southwest.
- Yesheva Elchonon Chabad, located at 7215 Waring Avenue, approximately 900 feet southwest.
- Robin Nursery School, located at 815 N. Alta Vista Blvd., approximately 1,050 feet southwest.
- Bancroft Middle School, located at 929 N. Las Palmas Ave., approximately 1,800 feet east.

However, the Project will have a less than significant impact during construction (with mitigation measures for lead-based paint, PCBs, methane, and soils containing COPCs) and will not emit any hazardous substances during operations. The Project would remove and ensure with mitigation that demolition of the existing structure does not emit hazardous materials. The schools would still be generally shielded from the Project Site by the La Brea Gateway development southwest, Willoughby Avenue, and intervening residential and commercial buildings to the south and southwest. Therefore, impacts of hazardous materials within one-quarter mile of a school will be less than significant.

⁷¹ *Navigate LA, City of Los Angeles, Bureau of Engineering, Schools and Districts Layer:*
<http://navigatela.lacity.org/index01.cfm>

- d) **Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Less Than Significant With Mitigation Incorporated. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the Project Site is included on any of the above referenced lists and would therefore pose an environmental hazard to the public or the environment. In meeting the provisions in Government Code Section 65962.5, commonly referred to as the “Cortese List,” database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency. The Project Site was not listed on any of the following databases:⁷²

- USEPA National Priorities List (NPL) within a 1-mile radius;
- USEPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) sites within a ½-mile radius;
- USEPA Comprehensive Environmental Response-No Further Remedial Action Planned (CERCNFRAP) sites within a ¼-mile radius;
- USEPA Corrective Action Report (CORRACTS) sites within a 1-mile radius;
- USEPA Resource Conservation and Recovery Information System-Treatment, Storage, and Disposal (RCRIS-TSD) sites within a ½-mile radius;
- USEPA “RCRIS-Large Quantity Generator” (RCRIS-LQG) within a ¼-mile radius;
- USEPA “RCRIS-Small Quantity Generator” (RCRIS-SQG) within a ¼ mile radius;
- USEPA Facility Index System/Facility Registry System (FINDS) for the Subject Property only;
- USEPA Emergency Response Notification System (ERNS) sites within the target property;

⁷² Pages 9-10, *Phase I Environmental Site Assessment, 904*, TOR Environmental, Inc., November 25, 2013, Revised July 23, 2014.

Pages 9-10, *Phase I Environmental Site Assessment, 926-932*, TOR Environmental, Inc., November 20, 2013, Revised August 25, 2014.

- California EnviroStor Database – ENVIROSTOR within a 1-mile radius;
- California Calsites Database – HIST CAL-SITES within a 1-mile radius;
- California Bond Expenditure Plan (BEP) within a 1-mile radius;
- California Waste Management Unit Database System (WMUDS/SWAT) within a ½-mile radius;
- California Cortese within a ½-mile radius;
- California Leaking Underground Storage Tank (LUST) within a ½-mile radius;
- California Facility Inventory Database (CA FID) within a ¼-mile radius; California Spills, Leaks, Investigation and Cleanups (SLIC) sites within a ½-mile radius;
- California Underground Storage Tanks (UST) within a ¼-mile radius;
- California Hazardous Substance Storage Container (HIST UST) within a ¼-mile radius;
- California Statewide Environmental Evaluation and Planning System (SWEEPS UST) within a ¼-mile radius;
- California Hazardous Material Incident Report System (CHMIRS) for the Subject Property only;
- California 65 Notification Records within a 1-mile radius;
- California Voluntary Cleanup Program Properties (VCP) within a ½-mile radius;
- California Cleaners within a ¼-mile radius; and
- California Facility and Manifest Data (HAZNET) for the Project Site only.

The Project Site was listed on the following databases:

- **Moderncraft Laundry Co. Office (EDR Site A5):** The EDR report indicates the Moderncraft Laundry Co. Office at 900 N. La Brea Avenue, included within the Project Site, is listed on the EDR US Historical Cleaners database. The database indicates that a steam laundry operation was present at the Project Site's 904 N. La Brea Avenue parcel in 1942. This is consistent with the Sanborn Map from 1950, which shows Moderncraft Laundry onsite with operations including dry cleaning. The potential for onsite soil impact from this historical source was evaluated by RSI in 2010 by the advancement of eight soil boreholes on the Project Site, including one borehole (GP-17) in the vicinity of the dry cleaning activities noted in the 1950 Sanborn map. No contaminants of potential concern were identified above applicable soil screening levels in the soil samples collected above the

zone of groundwater influence. Based on available data, the historical use of the site as Moderncraft Laundry Co. represents an *HREC* that is not a *REC*.⁷³

- **Mole/Richardson Company (EDR Sites A1 – A2):** The EDR report indicates the Mole/Richardson Company at 926 N. La Brea Avenue is listed on the CA FID UST, SWEEPS UST and Historical Cortese databases. The two UST databases are historical (now no longer used) databases for registered USTs. These databases indicate that a UST associated with the parcel at 926 N. La Brea was formerly registered to Mole Richardson. The Historical Cortese database is also no longer in use. This database indicates that there was a release from the UST associated with 926 N. La Brea. These database entries appear to pertain to the 2,000-gallon UST formerly located in the alley east (upgradient) of the 926 N. La Brea Subject Property parcel. The adjacent former UST is one potential source of contamination on the Mole Richardson Property (an open SLIC Case) at 937 N. Sycamore Avenue. The adjacent Mole Richardson SLIC Case is considered a *REC*.⁷⁴

According to EnviroStor, there are no cleanup sites, permitted sites, or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site. There is an identified LUFT (leaking underground fuel tanks) for 900 La Brea (former Metro car wash) case number 900360152⁷⁵. The cleanup was completed and the case closed on April 24, 1998.⁷⁶

According to GeoTracker, there are no other cleanup sites, land disposal sites, military sites WDR sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.⁷⁷ There is an identified LUST cleanup site at 900 La Brea, which is the case referred above and was closed as of April 24, 1998.

Although the Mole Richardson SLIC case does not appear on the GeoTracker database, searching GeoTracker with the SLIC Case ID Number (SL204EA2403) identified a number of publically available documents. TOR downloaded and reviewed selected documents available online in order to assess the

⁷³ Page 10, *Phase I Environmental Site Assessment, 904*, TOR Environmental, Inc., November 25, 2013, Revised July 23, 2014.

⁷⁴ Page 10, *Phase I Environmental Site Assessment, 926 and 932*, TOR Environmental, Inc., November 20, 2013, Revised August 25, 2014.

⁷⁵ California Department of Toxic Substance Control, EnviroStor, website: <http://www.envirostor.dtsc.ca.gov/public/>, accessed July 2, 2014.

⁷⁶ http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603700896

⁷⁷ California State Water Resources Control Board, GeoTracker, website: <http://geotracker.waterboards.ca.gov/map>, accessed July 2, 2014.

current condition of the Mole Richardson SLIC case.⁷⁸ Based on a study conducted by RSI in 2010, TPH and VOCs originating from the USTs to the northeast of the Project Site has impacted the groundwater as far as ¼ mile southwest of the USTs. **Mitigation Measure 8-5**, listed above, would apply.

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.⁷⁹ There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.⁸⁰ The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not been identified as a hazardous waste facility.⁸¹

The Project Site is not located on a list of hazardous material sites (and that the identified LUST cleanup site is considered complete and the case closed) and the Mole Richardson SLIC Case at 900 N. La Brea Avenue does not appear on GeoTracker database. However, documents related to the site were analyzed in the Phase I. TPH and VOCs originating from the USTs to the northeast of the Project Site has impacted the groundwater as far as ¼ mile southwest of the USTs. However, this impact can be mitigated to a less than significant level by **Mitigation Measure 8-5**, listed above.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Project is not within an airport hazard area.⁸² The Project Site is not located within two miles of a public airport. The nearest airports are Los Angeles International Airport (LAX) located 10.5 miles southwest, Santa Monica Airport located 8.5 miles southwest, Bob Hope-Burbank Airport located 7.5 miles north. Therefore no impact would occur.

⁷⁸ Pages 22-27, Phase I Environmental Site Assessment, 926 and 932, TOR Environmental, Inc., November 20, 2013, Revised August 25, 2014.

⁷⁹ California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf>, accessed July 2, 2014.

⁸⁰ California Environmental Protection Agency, Cortese List Data Resources, List of “Active” CDO and CAO from Water Board, website: <http://www.calepa.ca.gov/sitecleanup/corteselist/>, July 2, 2014.

⁸¹ California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: <http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities>, July 2, 2014.

⁸² City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 900-932 La Brea, website: <http://zimas.lacity.org/>.

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

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

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. Construction of the Project will not substantially impede public access or travel on public rights-of-way such as La Brea Avenue or Willoughby Avenue, and would not interfere with any adopted emergency response plan or emergency evacuation plan. The Project will attempt to park and stage for construction on-site as much as possible. During portions of the construction where off-site street surfaces are needed, the developer will submit for review and approval a traffic control plan detailing days, time of day, and safety features. Any off-site construction needs will attempted to be minimized and be conducted outside of peak traffic times. Construction worker vehicles that cannot be accommodated on Site will be provided off-street parking and shuttle service to the Project Site if needed.⁸³ The future (2018) traffic conditions with the Project show that none of the 11 study intersections would have a significant impact.⁸⁴ Environmental impacts may nevertheless result from Project implementation due to possible interference with an emergency response plan. However, these potential impacts will be mitigated to a less than significant level by **Mitigation Measure 8-7**. Therefore, impacts would be less than significant after mitigation.

Mitigation Measure

8-7 Emergency Evacuation Plan

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

⁸³ Page 46, *Traffic Impact Study*, Overland Traffic Consultants, July 2014.

⁸⁴ Table 10, *Traffic Impact Study*, Overland Traffic Consultants, July 2014.

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

No Impact. A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone,⁸⁵ nor does the Project Site contain any wildlands fire hazard terrain.⁸⁶ Therefore, no impacts will occur.

⁸⁵City of Los Angeles Department of City Planning, *Zoning Information and Map Access System*, search for 900-932 La Brea, website: <http://zimas.lacity.org/>.

⁸⁶ Los Angeles Safety Element, *Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles*: <http://cityplanning.lacity.org/cwd/gnlpln/saftvelt.pdf>.

9. HYDROLOGY AND WATER QUALITY

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

Less Than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements.⁸⁷ Requirements of the SUSMP are enforced through the City's plan approval and permit process. Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. It is an ordinance passed in 2011 amending LAMC 64.70 (the City's stormwater code) and expanding on the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP because it requires a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures. All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. A project must comply with the LID Best Management Practices (LID BMPs) (determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply.

⁸⁷ Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities*; Retail gasoline outlets*; Restaurants* Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). <http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/>

Construction

Demolition and construction activities at the Project Site have the potential to affect the quality of storm water runoff. Typically, runoff picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. There are three general sources of short-term construction-related stormwater pollution associated with the Project: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion. During construction, the Project Site would contain a variety of construction materials that are potential sources of stormwater pollution, such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Construction material spills can also be a source of stormwater pollution and/or soil contamination.

The Project will not be required to obtain a NPDES water quality permit from the LARWQCB since the discharge will be sent to the City's Stormwater System and not directly to surface waters.⁸⁸ The City is in compliance with all requirements of the NPDES Municipal Permit.⁸⁹ Implementation of appropriate project design features and compliance with the local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water. Construction activities associated with the Project are subject to City inspection and implementation of storm water BMPs. Since the construction of the Project will disturb greater than one acre of land (the total site area is 1.148 acres)⁹⁰, the Project Applicant will be required to obtain coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).⁹¹ Construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC, and the SWPPP and WWECP as applicable, would ensure that construction would not violate any water quality standards, or discharge requirements, or otherwise substantially degrade water quality. Therefore, construction-related impacts to water quality will be less than significant.

⁸⁸ <http://water.epa.gov/polwaste/npdes/>

⁸⁹ <http://www.lastormwater.org/about-us/npdes-municipal-permit/>

⁹⁰ See Section 2, Project Description.

⁹¹ California Environmental Protection Agency, State Water Resources Control Board, Storm Water Program, Construction Storm Water Program, website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml, accessed February 20, 2014.

Operation

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

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The nearest surface water in the vicinity is the Hollywood Reservoir, approximately 2.25 miles northeast of the Project Site. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site or nearby. A public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Project Site. The sources of public water for the City of Los Angeles are surface water from California Water Project and Colorado River purchased through the Metropolitan Water District (MWD) and groundwater.⁹²

The Project Site is located in an urbanized area of the City. The Project Site is currently developed with two buildings, surface parking, and a vacant parcel that was previously occupied with buildings. The Project will cover the entire site with a building. The vacant parcel is currently exposed dirt. However, since the dirt previously supported a building, it is well compacted and would not be a substantial source for groundwater recharge. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge. Therefore, the Project will have no impact with respect to groundwater supplies or recharge. Groundwater was encountered in borings at depth of 13 feet. The historic high

⁹²LADWP, *Water, Sources of Water*: <https://www.ladwp.com/>, accessed February 20, 2014

groundwater is approximately 10 feet below grade⁹³ The Project would require excavation for one subterranean level. Due to the shallow depth of groundwater, the footing excavations may encounter water and the base of the excavation may require stabilization due to anticipated pumping. Because the excavation could come close to the historic high groundwater level, the Geotechnical Engineering Investigation includes recommendations⁹⁴ identified as **Mitigation Measure 9-1**, to ensure that impacts are less than significant.

Mitigation Measure

9-1 Construction Dewatering

- Dewatering shall be performed by the installation of wells on the Project Site and withdrawing water prior to reaching the subgrade elevation. Dewatering shall be required to remove water from the footing excavations and reduce the potential for pumping subgrade soils.

Permanent Dewatering

- The subterranean level shall be designed for potential hydrostatic and buoyancy pressure. The structure may instead be designed with a permanent dewatering system. The subterranean portion of the building shall be designed with drainage devices to relieve hydrostatic pressure. These devices include drains outside the retaining walls as well as drainage below the proposed slab.
- An underslab drainage system installed below the subterranean garage floor slab shall consist of 1-foot thick layer of gravel underlying the entire floor slab, and subdrain pipes placed in gravel-filled drainage trenches leading to a sump pump. The drain lines shall consist of 4-inch perforated pipe, perforations down, placed in trenches approximately 1 foot wide and 1 foot in depth below the bottom of the gravel blanket. The pipes shall then be covered with gravel and the entire gravel and pipe system within the trenches would be wrapped in filter fabric. The gravel filled drainage trenches are typically spaced on approximately 40-foot centers, although there is flexibility in the spacing, depending on the column grid line spacing.

⁹³ Pages 3,4, 12 Geotechnical Engineering Investigation, Geotechnologies, Inc., April 1, 2014. Updated August 11, 2014.

⁹⁴ Page 15, Geotechnical Engineering Investigation, Geotechnologies, Inc., April, 2014. Updated August 11, 2014.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. Proper surface drainage is critical to the future performance of the Project. Saturation of a soil can cause it to lose internal shear strength and increase its compressibility, resulting in a change in the designated engineering properties. Proper Project Site drainage should be maintained at all times. Drainage across the Project Site is by sheetflow to the southeast.⁹⁵ The Project Site is also not near, nor would it be altering, a stream or river. However, because the proposed building size and layout would differ as compared to the existing building, the Geotechnical Engineering Investigation includes recommendations⁹⁶ identified as **Mitigation Measure 9-2**, to ensure that impacts are less than significant.

Mitigation Measure

9-2 Site Drainage

- All Site drainage, with the exception of any required to be disposed of onsite by stormwater regulations, shall be collected and transferred to the street in non-erosive drainage devices.
- The proposed structure shall be provided with roof drainage.
- Discharge from downspouts, roof drains, and scuppers shall not be permitted on unprotected soils within five feet of the building perimeter. Drainage shall not be allowed to pond anywhere on the Project Site, and especially not against any foundation or retaining wall.
- Drainage shall not be allowed to flow uncontrolled over any descending slope.
- Planters which are located within a distance equal to the depth of a retaining wall shall be sealed to prevent moisture adversely affecting the wall. Planters which are located within five feet of the foundation shall be sealed to prevent moisture affecting the earth materials supporting the foundation.

⁹⁵ Pages, 2, 44, Geotechnical Engineering Investigation, Geotechnologies, Inc., April 1, 2014. Updated August 11, 2014.

⁹⁶ Pages 44, Geotechnical Engineering Investigation, Geotechnologies, Inc., April 1, 2014. Updated August 11, 2014.

- d) **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

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

- e) **Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving a Project Site. A Project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. No natural watercourses exist on or in the vicinity of the Project Site. Drainage across the Project Site is by sheet flow across the southern vacant portion and the northern built portion toward the existing storm drain system. The storm drain system includes two catch basins at the northeast corner of La Brea and Willoughby. The catch basins are linked by a 12-inch collector RCP (reinforced concrete pipe) to an 18-inch collector RCP to a 21-inch main line RCP flowing south along La Brea Avenue.⁹⁷

Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 9(a), the Project is required to comply with the NPDES program, LID Best Management Practices, as well as the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants.

Construction

The Project would require excavation for one subterranean level and utility and foundation work. Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not

⁹⁷ *Navigate LA, City of Los Angeles, Bureau of Engineering, Storm Drains Layer:*
<http://navigatela.lacity.org/index01.cfm>

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

Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. These best management practices (BMPs) are formally described as **Mitigation Measure 9-3**. When properly designed and implemented, these “good-housekeeping” practices would reduce short-term construction-related impacts to a less than significant level by controlling dust and erosion that may occur onsite and leaks from any construction equipment. The project required to comply with the City of Los Angeles’ Low Impact Development (LID) Best Management Practices (BMPs), which are determined on a case by case basis by the Department of Public Works. Approval for building/grading permits will not be granted or issued until appropriate and applicable stormwater BMPS are incorporated into the project design plans.

Operation

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

Mitigation Measure

9-3 Stormwater Pollution (Demolition, Grading, and Construction Activities)

- 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.

- 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.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible.
- Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.

f) Would the project otherwise substantially degrade water quality?

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

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. This question would apply to the Project only if it were placing housing in a 100-year flood zone. The Project includes residential dwelling units; however, it would not be located in a 100-year flood hazard area according to the Los Angeles Safety Element map.⁹⁸ According to the Federal Emergency Management Agency (FEMA) the Flood Insurance Rate Map (FIRM) indicates that the Project Site is located within Flood Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain.⁹⁹ A 0.2 percent annual chance is equivalent to a 500-year flood (the general range is 10 years to 500 years) Therefore, the Project will not place housing within a 100-year flood hazard area and no impact related to this issue would occur.

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

No Impact. A significant impact may occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows. The Project Site is not located within a City-designated 100- or

⁹⁸ *Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles:* <http://cityplanning.lacity.org/cwd/gulpln/saftevt.pdf>.

⁹⁹ *FEMA, Flood Insurance Rate Maps, DFIRM 06037C1605F:* <https://msc.fema.gov/webapp/wcs/stores/servlet/mapstore/homepage/MapSearch.html>, July 2, 2014.

500-year floodplain.¹⁰⁰ Therefore, the Project will not be at risk of flooding and would not place structures in an area that would impede or redirect flood flows. No impacts to flood flows would occur.

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

Less Than Significant Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. The nearest surface water in the vicinity is the Hollywood Reservoir created by the Mulholland Dam, approximately 2.25 miles northeast of the Project Site. The Project Site, and much of the Hollywood area, is located within a potential inundation area.¹⁰¹ However, the result of the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing facilities. None of the 13 dams in the greater LA area was severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake.¹⁰²

The LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD).¹⁰³ DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures in order to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at seepage drains, and performing a thorough visual inspection. Many LADWP reservoirs have Movement and Settlement (M&S) survey points installed on, and near, the dams. These points are periodically measured using precision survey equipment. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. At least once per year, State DSOD inspectors accompany LADWP Reservoir Surveillance personnel into the field to inspect each dam and reservoir. The Water System's Geotechnical Engineering Group maintains a program for periodically analyzing its

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

¹⁰¹ *Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map:* <http://cityplanning.lacity.org/cwd/gnlpln/saftvelt.pdf>.

¹⁰² *Page II-16, Los Angeles Safety Element,* <http://cityplanning.lacity.org/cwd/gnlpln/saftvelt.pdf>.

¹⁰³ <http://www.water.ca.gov/damsafety/>

dams and reservoirs for earthquake safety.¹⁰⁴ Therefore, the Hollywood Reservoir and Mulholland Dam, as with other dams in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus the minimal risk of flooding from potential dam or levee failure will not be exacerbated by the development of the Project. Impacts related to flooding will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a Project Site is sufficiently close to the ocean or other water body to be potentially at risk for the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. The nearest surface water in the vicinity is the Hollywood Reservoir created by the Mulholland Dam, approximately 2.25 miles northeast of the Project Site. Mitigation of potential seiche action has been implemented by the LADWP through regulation of the level of water in its storage facilities and providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.¹⁰⁵ The Project Site is not located within an area potentially impacted by a tsunami, which is typically located along the coast of the Pacific Ocean.¹⁰⁶ The Project Site is not within a Hillside Area.¹⁰⁷ In addition, the City of Los Angeles ZIMAS mapping system¹⁰⁸ and the Safety Element of the City of Los Angeles¹⁰⁹ do

¹⁰⁴ LADWP, Water System Reservoir Surveillance Program: http://eng.lacity.org/projects/fmp/pdf/handout4_042009.pdf

¹⁰⁵ Page II-16, Los Angeles Safety Element, <http://cityplanning.lacity.org/cwd/gnlpln/saftvelt.pdf>.

¹⁰⁶ Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: <http://cityplanning.lacity.org/cwd/gnlpln/saftvelt.pdf>.

¹⁰⁷ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 900-932 La Brea, website: <http://zimas.lacity.org/>.

¹⁰⁸ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 900-932 La Brea, website: <http://zimas.lacity.org/>.

¹⁰⁹ Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: <http://cityplanning.lacity.org/cwd/gnlpln/saftvelt.pdf>, accessed July 2, 2014.

not classify the Project Site as within a landslide area, or identified as a bedrock or probably bedrock landslide site. The hillside area generally includes the Hollywood Hills, north of Franklin Avenue. Small areas (5-100 acres) of bedrock landslide sites are located in central Griffith Park. Further, according to the State of California Seismic Hazards Map¹¹⁰, the Project Site is not at risk for landslides.¹¹¹ Thus, there is no potential for mudflow. Therefore, development of the Project will not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. Impacts related to tsunamis, seiches, and mudflow will be less than significant.

¹¹⁰ California, Department of Conservation, *Landslide Maps*: <http://www.quake.ca.gov/gmaps/WH/landslidemaps.htm>, accessed July 2, 2014.

¹¹¹ *Landslide Inventory Map of the Hollywood Quadrangle*, California Geological Survey, April 2013: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/lsim/LSIM_Hollywood.pdf, accessed July 2, 2014.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community. The Project Site (as shown in Figure 2-2) is essentially comprised of less than one City block on the east side of La Brea Avenue. The Project is not of a scale or nature that could physically divide an established community. The Project is not affecting any right-of-ways. The Project would be built on an existing urban infill site currently improved with structures occupied by commercial uses and vacant land. As such, no impact related to physical division of an established community will occur.

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

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate. The following is a list of applicable plans:

Regional Level

- *Southern California Association of Governments*
 - *Regional Comprehensive Plan and Guide (RCPG)*
 - *Compass Blueprint*
 - *Regional Comprehensive Plan (RCP)*
 - *Regional Transportation Plan (RTP)*
- *South Coast Air Quality Management District's (SCAQMD)*
 - *Air Quality Management Plan (AQMP)*
- *Los Angeles County Metropolitan Transportation Authority's (Metro)*
 - *Congestion Management Plan (CMP) for Los Angeles County.*

City of Los Angeles

- *City of Los Angeles General Plan*
- *1988 Hollywood Community Plan*¹¹²
- *Industrial Land Use Policy*¹¹³
- *ZI-2433 Hollywood Community Plan Injunction*¹¹⁴
- *ZI-2374 Los Angeles State Enterprise Zone*
- *Los Angeles Municipal Code*

Consistency with Regional Plans

Southern California Association of Governments (SCAG)

Regional Comprehensive Plan and Guide (RCPG)

The RCPG was adopted in 1996 by the member agencies of SCAG to set broad goals for the Southern California region, with the exception of the County of San Diego, and to identify strategies for agencies at

¹¹² *Until recently, the Project Site was subject to the Hollywood Community Plan Update (HCP Update), which was adopted by City Council on June 19, 2012.*¹¹² *On December 10, 2013, the Superior Court of California issued a tentative ruling that the HCP Update and accompanying EIR were not legally adequate and should be invalidated.*¹¹² *On February 11, 2014 the court ordered a preemptory writ of mandate that the City take the necessary steps to rescind, vacate, and set aside all actions approving the HCP Update, the certified EIR and any and all actions that derive from the HCP Update. The court also enjoined the City from granting any authority, permits or entitlements that derive from the HCP Update or the EIR. On April 2, 2014, the City Council adopted Ordinance No. 182960 to comply with the court's order. Therefore, the HCP Update has been rescinded and invalidated. By operation of law, the 1988 Community Plan (1988 HCP), in conjunction with the applicable provisions of the Los Angeles Municipal Code (LAMC) guide the land use and zoning on the Project Site, respectively.*

¹¹³ *Memorandum dated January 3, 2008 from Gail Goldberg, Director of Planning and Cecilia Estolano, Chief Executive Officer of the Community Redevelopment Agency of Los Angeles, available at <http://cityplanning.lacity.org/Code_Studies/LanduseProj/Industrial_Files/StaffDirections.pdf> See also clarification memorandum dated February 22, 2008 from Gail Goldberg, available at <http://clkrep.lacity.org/onlinedocs/2007/07-0486_rpt_plan_02-22-08.pdf>*

¹¹⁴ *ZI-2433 became effective on February 18, 2014 in response to the LA County Superior Court's injunction prohibiting the City from granting any authority, permits, or entitlements which derive from the HCP Update or its EIR. <http://zimas.lacity.org/documents/zoneinfo/ZI2433.pdf>*

all levels of government to use in guiding their decision-making. The RCPG identifies significant issues and changes that can be anticipated by the year 2015 and beyond.

Adopted policies related to land use are contained primarily in the Growth Management chapter of the RCPG. The primary goal of the Growth Management chapter is to address issues related to growth and land use by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources, and enhance the quality of life in the region. SCAG uses the criteria in CEQA Guidelines, Section 15206 to define what a regionally significant project is:

1. A proposed local general plan, element, or amendment thereof for which an EIR was prepared.
2. A proposed residential development of more than 500 dwelling units.
3. A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.
4. A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.
5. A proposed hotel/motel of more than 500 rooms.
6. A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.
7. A project that would result in the cancellation of a Williamson Act Contract for any parcel of 100 or more acres.
8. A project for which an EIR was prepared and which is located in and substantially impacting an area of critical environmental sensitivity. This includes the California Coastal Zone.
9. A project that would substantially affect sensitive wildlife habitats such as riparian lands, wetlands, bays, estuaries, marshes, and habitats for rare and endangered species.
10. A project that would interfere with the attainment of regional water quality standards as stated in the approved areawide wastewater management plan.
11. A project that would provide housing, jobs, or occupancy for 500 or more people within 10 miles of a nuclear power plant.
12. A project that has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located.

The Growth Management chapters overall goals are to:¹¹⁵

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

While the Project is not of the scale to be considered regionally significant based on the criteria above, the Project will nevertheless be consistent with, or not interfere with implementation of, the goals of the Growth Management Chapter of the RCPG.

Compass Blueprint

As part of SCAG's Sustainability Program, Compass Blueprint serves the communities of Southern California by helping to build long-lasting partnerships and fostering innovative transportation and land-use planning. Table 3.10-1, SCAG Compass Blueprint, lists the initiatives and objectives of the SCAG Compass Blueprint and the Project's consistency with each of them. As shown, the Project will be consistent with the applicable (developer-controlled or focused) initiatives and objectives of the Compass Blueprint. The Compass Blueprint is driven by four key principles:¹¹⁶

1. Mobility - Getting where we want to go
2. Livability - Creating positive communities
3. Prosperity - Long-term health for the region
4. Sustainability - Ensuring that today's decisions do not compromise future generations

Regional Comprehensive Plan (RCP)

SCAG's 2008 RCP is a guidance document that was developed in response to the Regional Council directive in the 2002 Strategic Plan to develop a holistic, strategic plan for defining and solving the region's inter-related housing, traffic, water, and air quality challenges. The RCP incorporates input from the RCP Task Force, SCAG's policy committees and subregions, local governments, and other key stakeholders. RCP defines a vision for the SCAG region that includes balancing resource conservation, economic vitality, and quality of life. It also provides a long-term planning framework that describes

¹¹⁵ SCAG, RCPG Growth Management Chapter, page 3-1:
<http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGGrowthManagementChapter.pdf>

¹¹⁶ SCAG, Compass Blueprint: <http://www.compassblueprint.org/Pages/About%20Pages/About.aspx>

comprehensive responses to growth and infrastructure challenges and recommends an Action Plan targeted for the year 2035. The RCP does not mandate integrated resources planning; however, SCAG does request that local governments consider the recommendations set forth on the RCP in their General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions. The RCP is an advisory document that contains policies that apply to public and/or private sectors. Public sector includes SCAG, local and state governments, transportation commissions, and resource agencies and conservation groups. Many of the policies apply to SCAG and the public sector, and are intended to inform how SCAG and governments should work to integrate growth and land use planning. The RCP policies are organized in the following categories: Land Use and Housing, Open Space and Habitats, Water, Energy, Air Quality, Solid Waste, Transportation, Security and Emergency Preparedness, and Economy. Table 3.10-2, SCAG Regional Comprehensive Plan, lists the policies that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) policies of the Regional Comprehensive Plan.

Regional Transportation Plan (RTP)

On April 4, 2012, SCAG adopted the 2012-2035 Regional Transportation Plan (RTP). The Sustainable Communities Strategy (SCS) is a required element of the RTP. The RTP is a blueprint for making the best transportation and land use choices for the future and supporting those choices with wise investments. The RTP will result in more and better travel choices as well as safe, secure, and efficient transportation systems that provide improved access to opportunities, such as jobs, education, and healthcare for our residents. Furthermore, the RTP will create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for the region's 22 million residents by 2035. The RTP is built on the vision of mobility, economy, and sustainability.¹¹⁷ The RTP contains goals and policies that are directed to transportation planners and decision-makers. They are not applicable to local and private projects, such as this Project. Nonetheless, they are provided below:

Goals

1. Align the plan investments and policies with improving regional economic development and competitiveness.
2. Maximize mobility and accessibility for all people and goods in the region.
3. Ensure travel safety and reliability for all people and goods in the region.
4. Preserve and ensure a sustainable regional transportation system.

¹¹⁷ SCAG, RTP: <http://rtpscs.scag.ca.gov/Pages/default.aspx>

5. Maximize the productivity of our transportation system.
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking).
7. Actively encourage and create incentives for energy efficiency, where possible.
8. Encourage land use and growth patterns that facilitate transit and non-motorized transportation.
9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.

Policies

1. Transportation investments shall be based on SCAG's adopted regional Performance Indicators.
2. Ensuring safety, adequate maintenance, and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.
3. RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.
4. Transportation demand management (TDM) and non-motorized transportation will be focus areas, subject to Policy 1.
5. HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.
6. Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.

Applicability of SCAG Plans

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

The Project is not considered to be a regionally significant project pursuant to CEQA Guidelines 15206.¹¹⁸ The consideration for a residential development is more than 500 dwelling units and commercial building is employing more than 1,000 persons or more than 250,000 square feet. The Project would have approximately 169 residential units and approximately 37,385 square feet of retail. As such, the Project will not be required to demonstrate consistency with SCAG policies contained in the RCPG, Compass Blueprint, RCP, or RTP.

South Coast Air Quality Management District (SCAQMD)

Air Quality Management Plan (AQMP)

In the South Coast Air Basin, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2012 Air Quality Management Plan (AQMP).¹¹⁹ The AQMP works with the Southern California Association of Governments (SCAG) to forecast population growth for the region and develops a long-term attainment plan to accommodate the air pollution impacts of such growth. Because population growth drives the demand for jobs and housing that contribute to regional air pollution, projects that are consistent with regional population forecasts built into the AQMP are considered to have less-than-significant impacts on regional air quality. Consistency with jobs and housing projections are also considered as secondary barometers for growth.

Although the Project will increase population (see Section 13 Population and Housing discussion of this IS/MND), its impact on regional air quality is accommodated by the overall growth assumptions in the 2012 AQMP. Additionally, the Project is infill development that generally produces a smaller impact on regional emissions because it accommodates growth in an urban area with commercial density and transportation infrastructure that ultimately reduces vehicle travel demand and activity. The Project is consistent with the SCAQMD's 2012 AQMP and is considered to have a less-than-significant cumulative effect on regional air pollution.

Los Angeles County Metropolitan Transportation Authority (Metro)

Congestion Management Plan (CMP) for Los Angeles County.

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

¹¹⁸ CEQA, Section 15206, *Projects of Statewide, Regional, or Areawide Significance*: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/Handout_CCR_15206_Statewide,Regional,Areawide_052007.pdf, accessed February 20, 2014.

¹¹⁹ SCAQMD, AQMP: <http://www.aqmd.gov/aqmp/aqmpintro.htm>

Los Angeles County, Metro is the designated congestion management agency responsible for coordinating the CMP. See Section 16 Transportation and Traffic, question b, in this IS/MND, for a discussion of the CMP. The traffic study provided the following conclusion: No CMP intersection (Santa Monica and Highland Avenue) or freeway (Hollywood Freeway) impacts are anticipated.¹²⁰

Consistency with City and Local Plans

City of Los Angeles General Plan

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals.¹²¹ The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements.

Industrial¹²²

It is the intent of the General Plan Framework Element to preserve industrial lands for the retention and expansion of existing and attraction of new industrial uses that provide job opportunities for the City's residents. As indicated in the *Economic Development* Chapter of the Framework Element, some existing industrially zoned lands may be inappropriate for new industries and should be converted for other land uses. Where such lands are to be converted, their appropriate use shall be the subject of future planning studies. Policies provide for the consideration of a broader array of uses within the industrial zones than has traditionally been acceptable to facilitate the clustering of uses, which may include retail, that support the basic industries or the location of industries in the same area where the waste products of one can be recycled as a resource for another ("industrial ecology") or a campus-like cluster of related uses. Notably, Policy 3.1.5 proposes to "Allow amendments to the community plans and coastal plans to further refine General Plan Framework Element land use boundaries and categories to reflect local conditions, parcel characteristics, existing land use and public inputs."

¹²⁰ Page 47, *Traffic Impact Study*, *Overland Traffic Consultants*, July 2014. Included in the Appendices.

¹²¹ *California Government Code Section 65300*.

¹²² *General Plan, Chapter 3-Land Use*: <http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm>

Table 3.10-3, General Plan Land Use, lists the goals, objectives, and policies for land use that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) policies of the General Plan for each land use. The Project's conversion of marginal and context-inappropriate industrial lands to integrated commercial and residential use on a predominantly commercial corridor with residential uses across La Brea Avenue and nearby to the south, is consistent with the goal and objective of the General Plan Framework for Industrial. Therefore, no significant impacts due to consistency with land use designations in the General Plan Framework are anticipated.

Plan inconsistencies in and of themselves are not a significant impact on the environment cognizable under CEQA, which recognizes only direct physical changes in the environment or reasonably foreseeable indirect physical changes in the environment.¹²³ Moreover, the City's threshold of significance considers only inconsistencies with policies "adopted for the purpose of avoiding or mitigating an environmental effect." The Framework Element's industrial goals, objectives and policies were adopted for primarily economic purposes, not to avoid or mitigate environmental impacts. To the extent the Framework's provisions arguably reflect environmental considerations, they address whether industrial uses would affect nearby land uses. The Project does not implicate these policies because CEQA considers only the Project's impacts on its environment, not the environment's impacts on the Project.

Hollywood Community Plan

The Project Site is located within the Hollywood Community Plan which was adopted in December 1988 (1988 HCP).¹²⁴ Until recently, the Project Site was subject to the Hollywood Community Plan Update (HCP Update), which was adopted by City Council on June 19, 2012 (and its associated zoning ordinance as Ordinance No. 182,173). On December 10, 2013, the Superior Court of California issued a tentative ruling that the HCP Update and accompanying EIR were not legally adequate and should be invalidated.¹²⁵ On February 11, 2014, the court ordered a preemptory writ of mandate that the City take the necessary steps to rescind, vacate, and set aside all actions approving the HCP Update, the certified EIR and any and all actions that derive from the HCP Update. The court also enjoined the City from granting any authority, permits or entitlements that derive from the HCP Update or the EIR. On April 2, the City Council adopted a resolution to rescind the HCP Update and adopted Ordinance No. 182960 to repeal the associated zoning ordinance all to comply with the court's order. Therefore, the HCP Update and the associated zoning ordinance have been repealed, rescinded and invalidated. By operation of law, the 1988 Community Plan (See City Council action CF 12-0303 S4), in conjunction with the applicable

¹²³ See Guidelines Section 15064(d)-(e),

¹²⁴ 1988 Hollywood Community Plan: <http://cityplanning.lacity.org/complan/pdf/HwdCpTxt.pdf>

¹²⁵ Superior Court Judge Allan J. Goodman, December 10, 2013. Case Nos. BS138580, BS138169, and BS138370.

provisions of the Los Angeles Municipal Code (LAMC) guide the land use and zoning on the Project Site, respectively.

The 1988 HCP contains policies and objectives to guide development and uses planned within the City. Not every goal, policy, or objective is applicable to the Project or the Project Site. The 1988 HCP is 26 years old and provided projections through the year 2010. As such, some of its objectives and policies are out-of-date with the current existing setting, including the recent developments in the area, and the addition of the Metro Red Line subway and Metro Rapid bus routes. The 1988 HCP is intended to promote an arrangement of land use, circulation, and services that will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community within the larger framework of the City; guide the development, betterment, and change of the Community to meet existing and anticipated needs and conditions; balance growth and stability; reflect economic potentials and limits; land development and other trends; and protect investment to the extent reasonable and feasible. Table 3.10-4, 1988 Hollywood Community Plan, sets forth the 1988 HCP's seven objectives and land use (industry) policies and discusses the Project's consistency and applicability with each of them.

The seven objectives are directed to the City (government) and other various departments and agencies within, to coordinate and encourage certain types of development, while preserving open space. None of the objectives apply to private development. The Project has sent information requests describing the Project to the various public service and utility providers. In addition, the Project does not affect the circulation system (objective 6). The provisions of public services and utilities are coordinated by the various agencies (LAFD, LAPD, Parks and Recreation, and Library). The Project would not conflict with any of the objectives. The land use section also contained standards for housing and commercial lands. The Project Site does not have a residential or commercial land use designation. As such, these policies and standards do not apply. The 1988 HCP also contains policies and standards for circulation (directed to LADOT and Metro), recreation and parks (directed to LADRP), fire protection (directed to LAFD), public schools (directed to LAUSD), library (directed to the LAPL), and other public facilities (directed to energy provider LADWP), and social services (directed to social services providers). As such, these policies and standards do not apply to private developments, and are not applicable to this Project. The Project would be consistent with all applicable policies related to the buildings siting, location, uses, and design features.

The Hollywood Community Plan's Neighborhood Commercial designation corresponds to the C1, C2, C4, P, RAS3 and RAS4 zones. By implementation of the requested General Plan Amendment and Zone Change, the Project maintains consistency between the proposed land use designation (Neighborhood Commercial) and the proposed zone (C2).

Industrial Land Use Policy

The City's Industrial Land Use Policy (the "ILUP") is a memorandum to Planning Department staff providing guidance and direction regarding conversion of industrially-zoned land. The ILUP notes the City's policy is to generally retain industrial lands while acknowledging that redesignation may be

appropriate in certain circumstances. The Project is located within an Industrial Mixed Use District, which contemplates the conversion of industrial lands for projects with a jobs-producing component and certain community benefits.¹²⁶ Community benefits include a minimum job-producing component of one story or 0.5 to 1 FAR, and an affordable housing component with 10% of base density set aside for Very Low income households, including by density bonus.

Table 3.10-5, Industrial Land Use Policy, lists the policies applicable to developers for redesignation of industrial land. As shown, the Project will be consistent with the applicable policies of the ILUP. The Project's conversion of marginal and context-inappropriate industrial lands to a mixed-use development incorporating both affordable housing and a significant jobs-producing component is consistent with the ILUP. Therefore, no significant impacts due to consistency with the ILUP are anticipated. Moreover, preservation of industrially-zoned land is an economic, not an environmental issue. Accordingly, the ILUP is an economic policy project and is not intended to and does not promote the reduction of environmental impacts of redesignating industrial land to residential and commercial use.

Los Angeles State Enterprise Zone (ZI-2374)

The Project is within the Los Angeles State Enterprise Zone.¹²⁷ The Federal, State, and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. The Enterprise Zone (EZ) special provisions applicable to plan check relate to parking standards and height.

Parking Standards - Section 12.21A4(x)(3):

Except for the Downtown Business District parking area described in Section 12.21A4(i), projects within EZs may utilize a lower parking ratio for commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings thus increasing the buildable area of the parcel which is critical in older areas of the City where parcels are small.

Height - Section 12.21.4:

Special height districts "EZ1", "EZ1-L", "EZ1-VL", "EZ1-XL", "EZ2", "EZ3" and "EZ4" were established for Enterprise Zones. Height district "EZ1" increases the total floor area contained in

¹²⁶ *Industrial Land Use Policy, Geographically Specific Directions for Hollywood. December 2007.*

¹²⁷ *City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 900-932 La Brea, website: <http://zimas.lacity.org/>.*

all the buildings on a lot to three times the buildable area. Note that the “EZ...” height district suffix must be accomplished by a Zone Change.¹²⁸

The Project is providing 303 spaces, exceeding the LAMC requirement. The building will be 7 stories and a total height of 75'. The Project is requesting a Height District change to Height District 2, which contains no absolute height limit. Thus, height standard does not apply.

City of Los Angeles Planning and Zoning Code

The City of Los Angeles (the City) is the Lead Agency for the Project. In order to construct the Project, the applicant is requesting approval of the following actions from the City:¹²⁹

Discretionary Actions

1. A General Plan Amendment to amend the Hollywood Community Plan to re-designate the Project Site from Limited Manufacturing to Neighborhood Commercial;
2. A Vesting Zone Change from MR1-1 to C2-2D;
3. Site Plan Review for a development creating more than 50 dwelling units;
4. A Zoning Administrator's Adjustment to permit a five-foot side yard setback on the northern boundary of the Project Site at the first and second residentially-used levels in lieu of the 9 feet otherwise required; and
5. Haul Route permit to export up to 30,000 cubic yards of materials.

Ministerial Actions

6. A 35% increase in base density for setting aside 11% of base density for Very Low Income households.¹³⁰

¹²⁸ Enterprise Zone (ZI-2374): <http://zimas.lacity.org/documents/zoneinfo/ZI2374.pdf>

¹²⁹ Michael Gonzales, Project representation, October 5, 2014.

¹³⁰ LAMC Section 12.22.A.25(g)(1) provides that Density Bonus projects not requesting incentives shall be considered ministerial and do not require a separate application or entitlement.

Zoning

The Project is seeking a Vesting Zone Change from MR1-1 to C2-2D to allow residential and retail uses. The D Limitation will limit the Project to an FAR of no greater than 3.0 to 1.

Height and Floor-Area-Ratio (FAR)

The Site is within Height District 1, which imposes Floor Area Ratio (FAR) limitations, but does not impose any development height limits for a MR1-1 zone. Generally, Height District 1 for an M zone allows a 1.5:1 FAR

The Project requests a Zone Change to C2-2D. Commercially-zoned properties in Height District 2 are permitted unlimited height and an FAR of 6 to 1. Nonetheless, the Project will reach an FAR of no greater than 3.0 to 1. The Site is approximately 50,012.8 square feet and the Project would be approximately 150,038 square feet for a floor-area-ratio (FAR) of 3:1. This increase in FAR would also allow the development of residential and retail space in the Hollywood Community. The FAR would be consistent with recent increases in FAR in the area, including the under construction La Brea Gateway development, which had an FAR of 2.12 to 1.¹³¹

The C2 zone requires 400 square feet of land area per unit. Thus, the Site could support 125 residential units. The Project is seeking a 35% density bonus (44 units) for a total of 169 units.

Yards

The Project is seeking a Zoning Administrator's Adjustment, pursuant to Section 12.28, to permit a side yard setback of zero feet on the residential levels on the northern boundary of the Project Site in lieu of the 9 feet otherwise required. The Adjustment will allow residentially-used parking spaces on the second- and third-level to provide a five-foot setback, rather than a nine-foot setback. All dwelling units near the side lot line will be set back at least 16 feet, substantially exceeding required setbacks. Many buildings along La Brea Avenue do not observe side setbacks. Moreover, the intent of the residential setback provision is to ensure adequate setbacks for dwelling units, not residentially-used parking spaces. Therefore, the Project is designed consistent with these buildings.

Conclusion

The Project will not conflict with policies adopted to avoid or mitigate environmental impacts. The requested discretionary actions do not conflict with urban land uses in the area and the Project would not introduce a new incompatible use. La Brea Avenue in the Project's vicinity is primarily office, retail and residential uses. The Project's residential and retail uses are compatible with the residential neighborhood to the south. The proposed building's approximate 7-story height and 3:1 FAR would be comparable with

¹³¹ *Los Angeles City Planning Case No. DIR-2013-2491-SPR.*

other structures in the area, and thus will not introduce an incompatible scenic element into the community. Across La Brea Avenue from the Project Site is an existing 4-story office building, a proposed 6-story retail and office building, and an under construction retail and residential development to be five stories. Other uses in the area along La Brea Avenue, Formosa Avenue and Santa Monica Boulevard are 4 and 5 stories. Two under-construction projects on La Brea Avenue in the Project vicinity will reach 6 stories. Additionally, the residential and retail uses will not affect the viability or operation of light industrial uses in the vicinity. The Project maintains consistency with the Hollywood Community Plan through implementation of the requested General Plan Amendment and Zone Change. Finally, the Project is consistent with the ILUP by contributing a significant jobs-producing component (approximately 37,385 square feet of retail) while reserving 11% of its base density as affordable housing for Very Low Income households.

The Project is required to have 290 spaces. A basement level of parking will be provided with 111 stalls for the use of the retail tenants and the residential parking will be provided on two levels above the ground floor retail with 192 parking spaces for a total of 303 spaces. Additionally, Preferential Parking Districts in the multifamily-zoned areas south of Willoughby Avenue will preclude spillover parking impacts.¹³²

The Project is consistent with the SCAG guides and other regional guides, the General Plan, the 1988 HCP objectives and policies, to the extent feasible and applicable, as discussed above. As such, impacts with respect to applicable land use plans, policies and zoning would be less than significant.

CEQA requires analysis of potential impacts of the proposed project upon the existing physical environment. By contrast, potential impacts of the existing environment, i.e., existence of a nearby freeway, upon the proposed project is not considered an environmental impact of the proposed project and does not require analysis to comply with CEQA. However, in the interest of providing information to the public, and creating healthy communities, the City offers several measures for advisement. One of the measures is to improve indoor air quality with a MERV-rated or HEPA Air Filtration Equipment. This is included as **Mitigation Measure 10-1**. Therefore impacts would be less than significant.

Mitigation Measure

10-1 An air filtration system shall be installed and maintained with filters meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 11, to the satisfaction of the Department of Building and Safety.

¹³² *Preferential Parking District No. 40 encompasses, in part, the area south of Willoughby Avenue and east of La Brea Avenue. Preferential Parking District No. 53 encompasses, in part, the area south of Romaine Street and west of La Brea Avenue.*

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

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

**Table 3.10-1
SCAG Compass Blueprint**

Initiative and Objective	Discussion
Initiative 1 Increase the region’s mobility	Consistent. The Project would include residents, employees, customers, and visitors in an urban area that is well served by local transit lines (Metro 212/312, Metro 156/656, Metro 4/Rapid 704, Antelope Valley Transit 786, DASH Hollywood, Hollywood/Wilshire, and Beachwood Canyon).
Objective 1-1 Encouraging transportation investments and land use decisions that are mutually supportive	Consistent. The Project would increase activity in an urban area and the residents, employees, customers, and visitors, who could utilize the local transit lines.
Objective 1-2 Locating new housing near existing jobs and new jobs near existing housing	Consistent. The Project would be providing new housing on the retail/commercial focused portion of La Brea Avenue, and would be providing retail uses, which would provide jobs to the local residential community.
Objective 1-3 Encouraging transit-oriented development	Consistent. The Project would include residents, employees, customers and visitors in an urban area that is well served by local transit lines.
Objective 1-4 Promoting a variety of travel choices	Consistent. The Project would allow residents, employees, customers, and visitors to access the Project Site via vehicle, walking, public transit, and biking. The Project includes code-required bicycle parking.
Initiative 2 Enhance the livability of our communities	Consistent. The Project would redevelop an underutilized and low-density storage use with a denser, mixed-use residential and retail building.
Objective 2-1 Promoting in-fill development and redevelopment to revitalize existing communities	Consistent. The Project would be an infill project (urban land within a built up area surrounded by other developments) and redevelop an underutilized and low-density site with a denser, mixed-use residential and retail building.
Objective 2-2 Promoting developments which provide a mix of uses	Consistent. The Project would provide a mix of uses including residential and retail.
Objective 2-3 Promoting "people-scaled," walkable communities	Consistent. The Project would be designed with architectural features on its ground floor to be people-scaled and accessible, including ground-floor retail. The upper levels of the building (parking shielded by the building and residential levels) would be scaled with similar adjacent buildings along La Brea Avenue.
Objective 2-4 Supporting the preservation of stable neighborhoods	Consistent. The Project would provide residential and retail uses that are already included in the area. There would not be an introduction of a substantially altered use. The area also supports the scale of the building.
Initiative 3 Enable prosperity	Consistent. The Project would redevelop an underutilized and low-density site with a denser, mixed-use residential and retail building. This would increase the tax revenues and property tax generated at the Project Site.
Objective 3-1 Providing a variety of housing types in each community to meet the housing needs of all income levels	Consistent. The Project provides new housing in a variety of types (studio, 1-bedroom, and 2-bedroom units). Approximately 14 dwelling units will be reserved for households of Very Low Income as defined in LAMC Section 12.22.A.25(b).

Initiative and Objective	Discussion
Objective 3-2 Supporting educational opportunities that promote balanced growth	Not Applicable. The Project is not an educational facility.
Objective 3-3 Ensuring environmental justice regardless of race, ethnicity or income class	Consistent. The Project would provide residential and retail uses consistent with the federal, State, and local laws that prohibit discrimination based on race, ethnicity, or income class.
Objective 3-4 Supporting local and state fiscal policies that encourage balanced growth	Not Applicable. The Project is a private development and cannot affect local and state fiscal policies encouraging balanced growth.
Objective 3-5 Encouraging civic engagement	Not Applicable. The Project is a private development and cannot affect civic engagement.
Initiative 4 Promote sustainability for future generations	Consistent. The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint. The Project also includes measures that reduce consumption and generation of utility resources (such as water, wastewater, and solid waste), air quality emissions (pollution) and greenhouse gas emissions.
Objective 4-1 Developing strategies to accommodate growth that use resources efficiently, and minimize pollution and greenhouse gas emissions	Consistent. The Project is undergoing an environmental review process through CEQA, resulting in this Mitigated Negative Declaration that includes mitigation measures that avoid, minimize, rectify, reduce, or compensate any potential environmental impact. These potential impacts include utility resources, air quality emissions (pollution) and greenhouse gas emissions.
Objective 4-2 Preserving rural, agricultural, recreational and environmentally sensitive areas	Not Applicable. The Project is located on a developed area surrounded by a dense urban environment in Hollywood. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Project Site.
Objective 4-3 Focusing development in urban centers and existing cities	Consistent. The Project is located in the urban community of Hollywood in the City of Los Angeles.
Objective 4-4 Using "green" development techniques	Consistent. The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
<p><i>Source: SCAG, Compass Blueprint: http://www.compassblueprint.org/Pages/About%20Pages/About.aspx</i></p> <p><i>Table: CAJA Environmental Services, July 2014.</i></p>	

**Table 3.10-2
SCAG Regional Comprehensive Plan**

Policies	Discussion
Land Use and Housing¹	
<p>LU-6.2 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Programs.</p>	<p>Consistent. The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, through mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.</p>
Open Space and Habitat²	
<p>OSN-14 Developers and local governments should implement mitigation for open space impacts through the following activities:</p> <ul style="list-style-type: none"> • Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space. • Individual projects should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA’s Critter Crossings, and Ventura County Mitigation Guidelines. • Project level mitigation for RTP’s significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from 	<p>Consistent. The Project would be an urban infill development that avoids significant impacts to regionally significant open space resources. The Project is located in a developed area of Hollywood surrounded by other buildings. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Project Site. There are two street trees on the City sidewalk along La Brea Avenue, in front of the vacant land southern half. These are off-site street trees as part of the City’s planting program and not natural to the location. There are ornamental plants and sidewalk grass strips in front of the 932 La Brea building.</p>

Policies	Discussion
<p>the growth associated with transportation projects and improvements.</p> <ul style="list-style-type: none"> Project sponsors should fully mitigate direct and indirect impacts to open space resulting from implementation of regionally significant projects. 	
<p>OSC-9 Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.</p>	<p>Not Applicable. OSC-9 does not apply to this Project as it is not next to natural areas for outdoor recreation. The Site would not impede access to natural lands.</p>
<p>OSC-10 Developers and local governments should promote infill development and redevelopment to revitalize existing communities.</p>	<p>Consistent. The Project is an infill development in an existing community.</p>
<p>OSC-11 Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.</p>	<p>Consistent. The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as air quality (pollution) and solid waste recycling and reduction mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.</p>
<p>OSC-12 Developers and local governments should promote water-efficient land use and development.</p>	<p>Consistent. The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as water-efficient features, through mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Code is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.</p>
<p>OSC-13 Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.</p>	<p>Consistent. The Project would contain multiple uses (residential and retail) and be a redevelopment of an urban area.</p>
<p>Water³</p>	
<p>WA-9 Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.</p>	<p>Consistent. The Project includes conservation features to reduce operational water use, per LADWP and LAMC requirements.</p>
<p>WA-10 Developers and local governments should include conjunctive use as a water</p>	<p>Consistent. Conjunctive use is the coordinated management of surface water and groundwater supplies to maximize the yield of the overall water resource. An active form</p>

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

Policies	Discussion
<p>significantly reduce waste into their projects, zoning codes and other implementation mechanisms:</p> <ul style="list-style-type: none"> • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips. 	<p>biking and walking trips due to bicycle parking and within a pedestrian-oriented area along La Brea Avenue and Santa Monica Boulevard.</p>
<p>EN-10 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> • Using energy efficient materials in building design, construction, rehabilitation, and retrofit • Encouraging new development to exceed Title 24 energy efficiency requirements. • Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. • Utilizing efficient commercial/residential space and water heaters: this could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits. • Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, which allow communities to generate their own electricity • Orienting streets and buildings for best solar access. 	<p>Consistent. The Project would be in compliance with the City’s Green Building Ordinance, which contains energy efficient practices.</p>

Policies	Discussion
<ul style="list-style-type: none"> Encouraging buildings to obtain at least 20% of their electric load from renewable energy. 	
<p>EN-11 Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction should be completed according to the specifications of the energy provider.</p>	<p>Consistent. The Los Angeles Department of Water and Power responded with electricity information on August 18, 2014. The LADWP does not provide consumption rates so the SCAQMD rates are used to calculate estimate electrical usage for the Utilities section of this IS/MND. Electrical service is available and will be provided in accordance with the LADWP’s Rules Governing Water and Electric Service. Southern California Gas Company (SCG) responded with natural gas information on July 29, 2014. There is a 12-inch diameter on La Brea Avenue to serve the Project. In the event that SCG cannot provide service from the existing infrastructure, SCG will conduct system analysis and determine the best method to provide gas to the customer, when the total requested load for the Project is received.</p>
<p>EN-12 Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.</p>	<p>Not Applicable. This is an encouragement to incorporate solar panels, not a requirement.</p>
<p>EN-14 Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.</p>	<p>Consistent. The Project retail component would comply with the LAMC requirements for all mandatory (Code-required) transportation measures to reduce single-occupancy vehicle trips.</p>
<p>Solid Waste ⁵</p>	
<p>SW-14 Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council’s Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:</p> <ul style="list-style-type: none"> Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. Source reduction through (1) use of building materials that are more durable and 	<p>Consistent. The Project would include a demolition and construction waste recycling program as well as an operational recycling program as required by LAMC and Mitigation Measure 17-10. The Project will recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. During operation, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.</p>

Policies	Discussion
<p>easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.).</p> <ul style="list-style-type: none"> • Reuse of existing building structure and shell in renovation projects. • Building lifetime waste reduction measures that should be explored for new and remodeled buildings include: • Development of indoor recycling program and space. • Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components. 	
<p>SW-17 Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.</p>	<p>Not Applicable. The Project would not be a composting, or composting, recycling, or conversion technology facility.</p>
<p>SW-18 Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.</p>	<p>Not Applicable. The Project would not be a waste management facility.</p>
<p>SW-19 Developers and local governments should facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity’s waste stream becomes another entity’s raw material by making priority funding available for projects that involve co-location of facilities.</p>	<p>Not Applicable. The Project would not be an eco-industrial park.</p>
<p>SW-20 Developers and local governments should prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities near existing waste management or material recovery facilities.</p>	<p>Not Applicable. The Project would not be a solid waste management facility.</p>
<p>SCAG Regional Comprehensive Plan: http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf ¹ Page 21; ² Pages 34 and 39; ³ Pages 59-61; ⁴ Pages 75-76; ⁵ Pages 105-106 Table: CAJA Environmental Services, July 2014.</p>	

**Table 3.10-3
General Plan Land Use (Framework Element)**

Goal, Objective, Policies	Discussion
Distribution of Land Use	
<p>Objective 3.1 Accommodate a diversity of uses that support the needs of the City’s existing and future residents, businesses and visitors.</p>	<p>Consistent. The Project is consistent with this Objective by accommodating highly-demanded housing supply and neighborhood commercial services in close proximity to jobs and transit infrastructure, thereby supporting the needs of existing and future residents and businesses seeking compact, walkable and mixed-use environments.</p>
<p>Policy 3.1.5: Allow amendments to the community plans and coastal plans to further refine General Plan Framework Element land use boundaries and categories to reflect local conditions, parcel characteristics, existing land uses, and public input. These changes shall be allowed provided (a) that the basic differentiation and relationships among land use districts are maintained, (b) there is no reduction in overall housing capacity, and (c) additional environmental review is conducted in accordance with the California Environmental Quality Act should the impacts of the changes exceed the levels of significance defined and modify the conclusions of the Framework Element’s Environmental Impact Report.</p>	<p>Substantially Consistent. The Project’s General Plan Amendment will amend the Hollywood Community Plan land use designation boundaries to reflect local conditions, parcel characteristics, existing land uses, and public input.</p> <ul style="list-style-type: none"> Local conditions/existing land uses. Since the Hollywood Community Plan was adopted in 1988, local conditions and existing land uses have changed substantially. Whereas automotive, storage and light industrial uses were prevalent in the late 1980s, today La Brea Avenue is an emerging walkable, mixed-use community characterized by dense mixed-use multifamily and creative office developments. Given these dramatic changes in land use and local conditions, the one-block stretch of La Brea Avenue between Willoughby Avenue and Romaine Street has already seen one General Plan Amendment from Limited Manufacturing to Neighborhood Commercial, (915 La Brea), in addition to three zone changes to permit commercial (969 and 936 La Brea), or residential uses. (915 La Brea). Even properties along La Brea Avenue remaining within the MR1 zone are generally used for office, rather than traditional industrial, purposes that are permitted in the MR1 zone (i.e. light manufacturing, distribution plants, or truck terminals). The Project results in a Neighborhood Commercial land use designation that comports with now-prevailing uses and conditions in the vicinity. Parcel characteristics. The Property is poorly suited for the Limited Industrial designation because its highly-visible 350 feet of frontage along La Brea Avenue

Goal, Objective, Policies	Discussion
	<p>would severely detract from the neighborhood’s walkability and aesthetics if used industrially. Many traditional industrial uses are only permitted if they are enclosed completely with a 6-foot solid wall or fence – a development standard producing blank facades and hostile streetscapes. As La Brea Avenue emerges as a walkable street, the Property is ideally suited for a commercial rather than industrial designation.</p> <ul style="list-style-type: none"> • Public input. The Project is subject to CEQA and allows for public comment on the IS/MND and at public hearings. • The Project maintains the basic differentiation between land use designations by clearly differentiating compact commercial and residential uses lining La Brea Avenue from light industrially-used properties that do not line La Brea Avenue. It will provide residential and retail uses in a mixed-use structure consistent with the Neighborhood Commercial designation. No reduction in housing capacity will result. Environmental review is being conducted.
<p>Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.</p>	<p>Consistent. The Project advances this Objective by accommodating new multifamily residential and retail development in a neighborhood that is already highly urbanized and proximate to the intersection of existing (Santa Monica Boulevard) and planned (La Brea Avenue) transit corridors. The Project will conserve the existing residential neighborhoods south of Willoughby Avenue east and west of La Brea Avenue by directing population growth to an already-urbanized concentration of development. The Project also incorporates 14 units restricted for Very Low Income households.</p>
<p>Policy 3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram (Figure 3-1 and 3-2).</p>	<p>Consistent. Project advances this Objective by accommodating a new mixed-use residential and retail development in a neighborhood that is already highly urbanized and proximate to the intersection of existing (Santa Monica Boulevard) and planned (La Brea Avenue) transit corridors. The Project is not located within a stable residential neighborhood or low-intensity commercial district. Rather, it fronts a major corridor in rapid transition and characterized by new dense mixed-use residential, retail and office developments. The Project will conserve the existing residential and commercial districts south of Willoughby Avenue east and west of La Brea Avenue by directing population growth to an already-urbanized concentration of</p>

Goal, Objective, Policies	Discussion
	development.
Neighborhood District Characteristics/Uses (Table 3-1 of Framework)	
<p>Retail commercial, small professional offices, personal services, food stores, eating and drinking establishments, telecommunications centers, small cultural facilities (generally, 5,000 square feet or less), and similar uses.</p> <ul style="list-style-type: none"> Existing neighborhood-serving uses should be retained (barber shops, beauty salons, laundries, shoe repair, convenience commercial, childcare, community meeting facilities, etc.). Uses that occupy a building footprint generally exceeding 25,000 square feet, when they meet industrial development standards (supermarkets are exempt) Mixed-use structures integrating housing with commercial uses (includes density and other incentives) A focal point for surrounding residential neighborhoods and containing a diversity of land uses to encourage walking to and from adjacent neighborhoods, Neighborhood Districts are generally at a floor area ratio of 1.5:1 or less, characterized by one- to two-story buildings, pedestrian-oriented, and may be served by a local shuttle service. Gasoline/automotive services which may also provide accessory uses such as retail, food stores, restaurants and/or take-out meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality. 	<p>Consistent. The General Plan Amendment is consistent with this Objective and Policy by accommodating a Project converting marginal and underutilized industrial land on a dynamic mixed-use corridor into a new mixed-use structure. The Project will incorporate a substantial ground-floor commercial space which will both serve and employ local residents, thereby meeting the needs of local residents and sustaining economic growth. Finally, the Project will generate additional sales tax revenue for the city, far exceeding its revenue potential for industrial use and contributing to economic growth. Therefore, the Project contributes to a balance of land uses, meets the needs of local residents and generates economic growth.</p> <p>Substantially consistent. The Project is a mixed-use structure integrating housing and commercial uses and employing a density bonus. The Project will contribute to the vicinity’s status as a focal point for the surrounding residential neighborhood by expanding the diversity of land uses within walking distance. No neighborhood-serving uses are on-site – only storage buildings with ancillary office and surface parking lots.</p>
<p>Policy 7.2.8: Retain the current manufacturing and industrial land use designations, consistent with other Framework Element policies, to provide adequate quantities of land for emerging industrial sectors.</p>	<p>Partly consistent. The Project is consistent with retaining adequate quantities of land for emerging industrial sectors because the Property is poorly suited for such uses due to its prominent location on a walkable mixed-use portion of La Brea Avenue characterized by office and residential uses.</p>
<p>Objective 3.8: Reinforce existing and establish new neighborhood districts which accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed</p>	<p>Consistent. The Project would establish a broad range of uses such as residential and retail that would serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed as desirable places to</p>

Goal, Objective, Policies	Discussion
as desirable places to work and visit.	work and visit.
Industrial	
GOAL 3J Industrial growth that provides job opportunities for the City's residents and maintains the City's fiscal viability.	Consistent. The Project would include retail that provides jobs. The Project does not hinder industrial job growth because the site is ill-suited for employment-intensive industrial use.
Objective 3.14 Provide land and supporting services for the retention of existing and attraction of new industries.	Consistent. The Project would provide retail uses that could support new industries. The Project does not hinder retention of existing and attraction of new industries because the site contains no existing industry and is ill-suited for new industrial use.
Policy 3.14.1 Accommodate the development of industrial uses in areas designated as "Industrial-Light," "Industrial-Heavy," and "Industrial-Transit" in accordance with Tables 3-1 and 3-9. The range and intensities of uses permitted in any area shall be determined by the community plans.	<p>Substantially Consistent. According to Table 3-9, the Industrial-Light designation corresponds to the MR1 zone. According to Table 3-1, the Industrial-Light category has the following typical uses:</p> <ul style="list-style-type: none"> • Industrial uses with potential for a low level of adverse impacts on surrounding land uses • Increased range of commercial uses that <i>support</i> industrial uses (through zoning amendments) • Possible consideration for other uses where parcels will not support viable industrial uses (determined by community plan) <p>According to Table 3-9, the Industrial-Light land use designation corresponds to a MR1 zone for the Project Site. The Project is seeking a density bonus to permit an FAR of 3.0 to 1 in lieu of the 1.5 to 1 FAR otherwise permitted in the C2-1 zone.</p> <p>The Project will re-designate the Property from Limited Industrial to Neighborhood Commercial. Thus, the Project will not accommodate industrial uses on the Property. However, the Project converts marginal industrial land to other uses as contemplated by the Industrial Light policy to give “consideration to other uses where parcels will not support viable industrial uses.”</p>
Policy 3.14.2 Provide flexible zoning to facilitate the clustering of industries and	Not Applicable. The Project consists of a small 1.15 acre Site and has no control over

Goal, Objective, Policies	Discussion
supporting uses, thereby establishing viable "themed" sectors (e.g., movie/television/media production, set design, reproductions, etc.).	adjacent parcels. The adjacent uses are offices, retail, storage/warehouse, and residential to the southeast. Major industrial uses have been largely removed from this area of La Brea Avenue.
Policy 3.14.3 Promote the re-use of industrial corridors for small scale incubator industries.	Not Applicable. Major industrial uses have been largely removed from this area of La Brea Avenue.
Policy 3.14.5 Promote the development of a mix of commercial and light industrial uses in areas designated as Industrial-Transit.	Not Applicable. The Project Site is not designated Industrial-Transit.
<p>Policy 3.14.6 Consider the potential re-designation of marginal industrial lands for alternative uses by amending the community plans based on the following criteria:</p> <ul style="list-style-type: none"> a. Where it can be demonstrated that the existing parcelization precludes effective use for industrial or supporting functions and where there is no available method to assemble parcels into a unified site that will support viable industrial development; b. Where the size and/or the configuration of assembled parcels are insufficient to accommodate viable industrial development; c. Where the size, use, and/or configuration of the industrial parcels adversely impact adjacent residential neighborhoods; d. Where available infrastructure is inadequate and improvements are economically infeasible to support the needs of industrial uses; e. Where the conversion of industrial lands to an alternative use will not create a fragmented pattern of development and reduce the integrity and viability of existing industrial areas; f. Where the conversion of industrial lands to an alternative use will not result in an 	<p>Substantially consistent. The Project is consistent with this Policy by re-designating marginal and context-inappropriate industrial lands for compatible commercial and residential uses.</p> <ul style="list-style-type: none"> a. The Property’s elongated size and configuration fronting La Brea Avenue adversely affects surrounding residential uses by relegating to marginal industrial uses a highly-visible property on an emerging walkable street. The Property’s approximately 350 linear feet of frontage along La Brea Avenue would severely detract from the neighborhood’s walkability if used industrially. The types of uses permitted within the MR1 zone, such as storage or automobile repair, are antithetical to a walkable neighborhood. Many permitted uses must be completely enclosed “with a solid wall or solid fence not less than six feet in height”¹³³ – a development standard producing blank facades and hostile streetscapes. Thus, the particular size and configuration of the Property – with extensive frontage along an otherwise walkable, mixed-use avenue – would adversely impact residential neighborhoods by detracting from walkability and producing a highly unappealing streetscape. b. The Project will not result in a fragmented pattern of development because it will

¹³³ LAMC Section 12.17.5.B.5.

Goal, Objective, Policies	Discussion
<p>adverse impact on adjacent residential neighborhoods, commercial districts, or other land uses;</p> <p>g. Where it can be demonstrated that the reduction of industrial lands will not adversely impact the City's ability to accommodate sufficient industrial uses to provide jobs for the City's residents or incur adverse fiscal impacts; and/or</p> <p>h. Where existing industrial uses constitute a hazard to adjacent residential or natural areas.</p>	<p>result in a substantially continuous pattern of commercial and mixed-use development along the La Brea corridor. The Project will not impact the viability or integrity of existing industrial uses on Formosa Avenue and Sycamore Avenue. Existing and future improvements to these properties will be compatible with the Project due to the limited intensity of uses permitted in the MR1 zone, and because external noises, odors and vibrations from such uses are strictly regulated. Moreover, a fully-improved alley buffers the Project from industrial property. Finally, the only residential units within the Project facing industrially-zoned land east of the Project are located at and above the fourth floor, approximately 35 feet above-grade. The height differential further isolates residential uses from light industrial uses, ensuring the light industrial uses will remain free to conduct their business without interference to residential uses, thereby retaining their viability and integrity.</p> <p>c. The Project's conversion of industrial land to residential and commercial uses will not result in an adverse impact on adjacent residential neighborhoods, commercial districts or other land uses. The Project's residential and retail uses are compatible with residential, office and retail uses on La Brea Avenue and to the south. Likewise, the residential and retail uses are compatible with light industrial uses in the vicinity which are generally conducted entirely indoors and are strictly regulated from emanating noise, odors and vibrations.</p> <p>The conversion of the Property from industrial to commercial and residential use will not adversely impact the City's ability to provide jobs or generate revenue. The Property is only capable of supporting marginal industrial uses with few employment opportunities. In addition to many construction jobs, the proposed 37,385 square feet of ground-floor retail will generate numerous job opportunities and generate revenue for the City.</p>
<p>Policy 3.14.7 Consider the potential redesignation of non-industrial properties located adjacent to lands designated and developed with industrial uses for industrial purposes by amending the community plans or by conditional use permits based on the following</p>	<p>Not Applicable. The Project is not considering re-designation of non-industrial properties located adjacent to lands designated and developed with industrial uses.</p>

Goal, Objective, Policies	Discussion
<p>criteria:</p> <p>a. The redesignation is required to accommodate the expansion of existing industrial uses to facilitate their retention in areas in which they are located;</p> <p>b. There is substantial support of the property owners of the parcels to be redesignated;</p> <p>c. There is no significant disruption or intrusion into existing residential neighborhoods, commercial districts, or other land uses;</p> <p>d. There are no adverse environmental impacts (traffic, noise, lighting, air pollution, other) on adjacent land uses due to the industrial uses; and</p> <p>e. There is adequate infrastructure to support the expanded industrial use(s).</p>	<p>The adjacent uses are offices, retail, storage/warehouse, and residential to the southeast.</p>
<p>Policy 3.14.8 Encourage the development in areas designated as "Industrial-Heavy" of critical public facilities that are necessary to support the needs of residents and businesses but normally are incompatible with residential neighborhoods and commercial districts, such as corporate yards.</p>	<p>Not Applicable. The Project Site is not designated Industrial Heavy.</p>
<p>Policy 3.14.9 Initiate programs for lot consolidation and implement improvements to assist in the retention/expansion of existing and attraction of new industrial uses, where feasible.</p>	<p>Not Applicable. The Project consists of a 1.15 acre Site and has no control over adjacent parcels.</p>
<p><i>General Plan, Chapter 3-Land Use, Industrial: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03209.htm</i> <i>Table: CAJA Environmental Services, October 2014.</i></p>	

**Table 3.10-4
1988 Hollywood Community Plan**

Objective and Policies	Discussion
Objectives of the Plan	
<p>Objective 1 To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area.</p> <p>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.</p>	<p>Consistent. The Project coordinates development of Hollywood with that of the City of West Hollywood, located north of Romaine Street barely 350 feet north of the Property. Since the adoption of the Hollywood Community Plan in 1988, the City of West Hollywood has made substantial pedestrian, bicycle and transit improvements along both Santa Monica Boulevard and La Brea Avenue. Capitalizing on the walkable urban environment, numerous office, retail, residential and mixed-use structures are proposed or have been developed on or within 300 feet of La Brea Avenue. Such developments within the City of West Hollywood include:</p> <ul style="list-style-type: none"> • The West Hollywood Gateway, • Related project No. 3 (1222 N. La Brea Avenue), including 187 dwelling units and 18,159 square feet of ground-floor retail. • Related project No. 6 (1145 N. La Brea Avenue), including 37 dwelling units and 1,315 square feet of ground-floor retail. • Related project No. 13 (7113 Santa Monica Boulevard), including 184 dwelling units and 12,800 square feet of ground-floor retail. • Related project No 14 (7141 Santa Monica Boulevard), including 166 dwelling units and 9,655 square feet of ground-floor retail. <p>Within the City of Los Angeles, on the 900 block of North La Brea Avenue, commercial, residential and retail uses predominate despite industrial zoning. The Project will re-designate the Property to Neighborhood Commercial, allowing the conversion of marginal and context-inappropriate industrial land to a mixed-use development, thereby promoting rational and coordinated land use planning along La Brea Avenue from the City of West Hollywood to the City of Los Angeles.</p> <p>Furthermore, the Project provides residential, employment, and retail services in the Hollywood area and furthers the development of Hollywood as a major center of population, employment retail services and entertainment.</p>
<p>Objective 2 To designate lands at appropriate locations for the various private uses and</p>	<p>Consistent. The Project provides residential and retail uses that would accommodate</p>

Objective and Policies	Discussion
<p>public facilities in the quantities and at densities required to accommodate population and activities projected to the year 2010.</p>	<p>the surrounding area beyond the projected year of 2010. Additionally, the Project's proposed FAR is more consistent with the area's urban character and more appropriate to accommodate population and activities beyond the projected year of 2010.</p>
<p>Objective 3 To make provisions for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice.</p> <p>To encourage the preservation and enhancement of the varied and distinctive residential character of the community, and to protect lower density housing from the scattered intrusion of apartments.</p> <p>In hillside residential areas to:</p> <ol style="list-style-type: none"> a. Minimize grading so as to retain the natural terrain and ecological balance. b. Provide a standard of land use intensity and population density which will be compatible with street capacity, public service facilities and utilities, and topography and in coordination with development in the remainder of the City. 	<p>Consistent. The Project would provide housing in a variety of sizes (studio, 1-bedroom, and 2-bedroom units) and includes units affordable to Very Low Income households. The Project also maximizes the opportunity for individual choice by expanding opportunities for persons of varying income levels to live in close proximity to jobs, transit and neighborhood services. The Project is not in a hillside residential area.</p>
<p>Objective 4 To promote economic well being and public convenience through:</p> <ol style="list-style-type: none"> a. Allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards. b. Designating lands for industrial development that can be so used without detriment to adjacent uses of other types, and imposing restrictions on the types and intensities of industrial uses as are necessary for this purpose. c. Encouraging the revitalization of the motion picture industry. 	<p>Substantially Consistent. The Project provides residential and retail uses. The proposed FAR is consistent with smart growth principles. It provides ground-floor retail along a transit corridor and appropriately locates density near transit, thereby assisting with efforts to reduce vehicle miles traveled and to increase pedestrian walkability and other modes of transit.</p> <p>The Project does not include industrial uses. While the existing uses are storage with ancillary support office. There is nothing unique or essential about the existing building (i.e. not a sound stage or backlot), nor is the building substantial enough that the storage could not be accommodated in different locations.</p> <p>The Project will not affect the concentration of medical facilities in East Hollywood.</p>

Objective and Policies	Discussion
d. Recognizing the existing concentration of medical facilities in East Hollywood as a center serving the medical needs of Los Angeles.	
Objective 5 To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.	Consistent. The Project has sent information request letters to coordinate the development of the Project with public facilities such as the Los Angeles Department of Water and Power for electricity and water services, the Bureau of Sanitation for wastewater services, the Recreation and Parks Department for parks and open space information, and the LAFD and LAPD for fire and police protection.
Objective 6 To make provisions for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage expansion and improvement of public transportation service.	Consistent. The IS/MND includes a traffic analysis that analyzes the potential impacts to the area’s circulation system. This analysis is based on the Traffic Study, which was reviewed and approved by the Los Angeles Department of Transportation.
Objective 7 To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.	Not Applicable. The Project is an infill development surrounded by existing developments. While the southern half is vacant land, there is no public open space on the Project Site. The Project Site does not provide views, natural character and topography of the mountainous parts of the area.
Land Use – Industry – Standards and Criteria	
Industrial lands are located on a citywide basis without regard to the boundaries of individual communities or districts, under the general principle that such employment should be available within a reasonable commuting distance from residential locations. On-street parking should be discouraged in industrial areas.	Not Applicable. The standard was designed to meet the needs of area through 2010. The Project would be operational in 2018. Since the 1988 HCP was adopted, the area has been substantially converted to retail uses, and mixed uses (La Brea Gateway) directly south. The standards of the 1988 HCP no longer reflect the environmental setting of the area. In addition, there are residential areas across Willoughby Avenue. The Project does not encourage on-street parking because LAMC required parking is provided on the Project Site.
If industrial expansion is permitted into residential areas, it should be conducted according to a planned development program to avoid a mixture of uses. Industrial lands areas intended to be limited and restricted to types of uses which will avoid nuisances to other uses on adjacent lands.	Not Applicable. The Project is not an industrial expansion but rather a residential and retail building in an area that supports these uses. It would be across the street from the under construction La Brea Gateway which has residential and retail uses and immediately south of an office and retail building. There would not be a use which creates nuisances to other adjacent lands.
<p>Source: 1988 Hollywood Community Plan, pages HO-1 to HO-3: http://cityplanning.lacity.org/complan/pdf/HwdCpTxt.pdf</p> <p>Table: CAJA Environmental Services, July 2014.</p>	

**Table 3.10-5
Industrial Land Use Policy**

Policies	Discussion
<p>Short Term:</p> <ul style="list-style-type: none"> • Staff should generally recommend denial of applications for conversion of industrial to other uses. • To ensure that Industrial Mixed Use Districts remain primarily job-producing lands, staff should recommend approval of a residential development only with a jobs-producing component and other Community Benefits (see Section B). Where staff can make the findings for a project’s approval, Community Benefits should be applied to address the loss of economic activity and jobs, and to offset the impact of the permanent loss of employment land. <p>Community benefits include relocation consultation for displaced business, contributions to a job training assistance fund, a minimum job-producing space of 0.5 FAR or one floor, 10% very low affordable units restricted by covenant for 55 years, open space fees based on R5 Quimby fees, and infrastructure improvements.</p>	<p>Consistent. The Project is consistent with the ILUP by accommodating a converting marginal industrial lands to accommodate the Project which includes, which includes a substantial jobs-producing component of 37,385 square-feet of ground-floor retail occupying the majority of the ground floor and achieving an FAR of approximately 0.75. The Project will also contribute 14 units of affordable housing for Very Low-income households, constituting 11% of the Project’s base density.</p> <p>Moreover, the ILUP is an economic policy adopted to preserve industrial lands for economic and employment purposes, not to address environmental impacts resulting from changing industrial lands to other uses. As such, it is not pertinent to environmental impacts analysis under CEQA.</p>
<p><i>Source: http://cityplanning.lacity.org/Code_Studies/LanduseProj/Industrial_Files/StaffDirections.pdf</i> <i>Table: CAJA Environmental Services, October 2014.</i></p>	

11. MINERAL RESOURCES

a) **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 sites in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.¹³⁴

MRZ-2 sites are identified in two community plan elements of the city's general plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.¹³⁵ Neither the Project Site nor the surrounding area is identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Project Site is not located within any Major Oil Drilling Areas, which are 25 City designated major oil drilling areas. The nearest one is #16 Salt Lake Oil Field, a broad swath of land generally south of Melrose Avenue, north of Wilshire, east of Beverly Hills, and west of Vine Street.¹³⁶ The California Department of Conservation has online mapping of wells. No oil wells exist on the Project Site.¹³⁷ The nearest well (API 03706343 Chevron U.S.A. Inc.) is located northwest of the Project Site, on Romaine Street near Formosa Avenue. Therefore, no impacts to mineral resources of regional or statewide significance will occur.

¹³⁴ City of Los Angeles Department of City Planning, *Conservation Element, adopted September 2001, page II-58*: <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed April 2014.

¹³⁵ City of Los Angeles Department of City Planning, *Conservation Element, adopted September 2001, page II-59*: <http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf>, accessed April 2014.

¹³⁶ City of Los Angeles Department of City Planning, *Safety Element Exhibit E, Oil Field and Oil Drilling Areas*: <http://cityplanning.lacity.org/cwd/gnlpln/safteyelt.pdf>, accessed April 2014.

¹³⁷ State of California Department of Conservation, *Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1, website: http://maps.conservation.ca.gov/doggr/#*, April 2014.

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

No Impact. A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or potential future locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction.

The Project Site is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the response to Question 11(a), no oil wells exist on the Project Site. Furthermore, the Project Site is surrounded by dense urban uses and residential uses. Thus, the Project Site would not be an adequate candidate for mineral extraction. Therefore, no impacts to loss of availability of a locally important mineral resource will occur.

12. NOISE

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

A Air Quality, Noise, and Greenhouse Gases Appendices, DKA Planning, September 2014.

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

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

Noise Definitions

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

- Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 PM and 10:00 PM is as if the sound were actually 5 dBA higher than if it occurred from 7:00 AM to 7:00 PM when background ambient noise levels are higher. From 10:00 PM to 7:00 AM, humans perceive sound as if it were 10 dBA higher due to an even lower background noise level. Accordingly, the CNEL is obtained by adding an additional 5 dBA to measured or projected sound levels in the evening from 7:00 PM to 10:00 PM and 10 dBA to sound levels in the night from 10:00 PM to 7:00 AM. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour measured or projected average.
- Equivalent Noise Level. L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Effects of Noise

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

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

Audible Noise Changes

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

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

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

**Table 3.12-1
Land Use Compatibility for Community Noise Environments**

Land Use Compatibility	Community Noise Exposure (dBA, CNEL)							
	<	55	60	65	70	75	80	>
Residential – Low Density Single-Family, Duplex Mobile Homes	NA							
		CA						
					NU			
						CU		
Residential – Multi-Family	NA							
		CA						
					NU			
						CU		
Transient Lodging – Motels, Hotels	NA							
		CA						
					NU			
							CU	
Schools, Libraries, Churches, Hospitals, Nursing Homes	NA							
		CA						
					NU			
							CU	
Auditoriums, Concert Halls, Amphitheaters	NA							
		CA						
					NU			
						CU		
Sports Arenas, Outdoor Spectator Sports	NA							
		CA						
					NU			
						CU		
Playgrounds, Neighborhood Parks	NA							
					NU			
							CU	
Golf Courses, Riding Stables, Water Recreation, Cemeteries	NA							
					NU			
							CU	
Office Buildings, Business Commercial and Professional	NA							
					CA			
							NU	
Industrial, Manufacturing, Utilities, Agriculture	NA							
					CA			
							NU	

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

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

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

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

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

Applicable Regulations

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

- 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;
- 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;
- 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.¹³⁸

Additionally, according to the LAMC, a noise level increase of five decibels over the existing average ambient noise level at an adjacent property line is considered a noise violation.¹³⁹ This standard applies to sources such as consumer electronics, HVAC systems, powered equipment intended for repeated use in residential areas and motor vehicles driven onsite. Section 41.40 of the LAMC also prohibits construction activity from occurring between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6 PM and 8 AM on Saturday. No construction activity is permitted on Sunday and federal holidays.

¹³⁸ *City of Los Angeles, Municipal Code, Section 112.05.*

¹³⁹ *LAMC Section 112.04.*

Construction Noise Impacts

During construction, ground clearing, grading, structural, and other noise-generating activities would occur at the project site between the hours of 7:00 AM and 9:00 PM in accordance with the LAMC. Table 3.12-2 summarizes projected noise levels at nearby sensitive receptors identified below during construction. Assumptions regarding the mix of equipment by construction phase are summarized with the model sheets in the Appendices. Land uses on the properties surrounding the Project Site include multi-family residential, commercial, and office uses. For purposes of assessing noise impacts, the following nearest sensitive receptors¹⁴⁰ to the Project Site were identified:

- 915 North La Brea, (La Brea Gateway mixed-use project). Construction is occurring across La Brea Avenue of the Project Site and is expected to be occupied or nearly completed during the construction of the Project.¹⁴¹
- 860 Sycamore Avenue, an existing single-family residence that is approximately 245 feet to the east of the Project Site's southeast boundary. While this is the residence nearest the Project Site, there are many more residences in the neighborhood but at a further distance, and with intervening structures.
- 7118 Willoughby Avenue, an existing multi-family residential building that is 220 feet southwest of the Project Site. This residence is the closest to the Project Site to the west across La Brea Avenue, but there are intervening commercial structures and separate residential garage structures.
- 937 North Sycamore Avenue, the Mole-Richardson Soundstage, an operating studio training facility for the entertainment industry. This noise-sensitive use is housed in an enclosed, one-story building across the alley behind the Project Site. There is also a rear loading dock/parking area that is not considered noise sensitive use.

To ascertain the ambient noise levels at these sensitive receptors, short-term, 15-minute noise readings¹⁴² were taken on July 21, 2014¹⁴³ using a Quest Technologies SoundPro DL Sound Level Meter.¹⁴⁴

¹⁴⁰ Sensitive receptors for noise purposes are defined as land uses where quiet is an essential element in their intended purpose (e.g., indoor concert halls), residences and buildings where people sleep, or institutional land uses with primarily daytime and evening use such as schools, places of worship, and libraries.

¹⁴¹ La Brea Gateway: <http://www.labreaprogress.com/timeline.html>

¹⁴² At 860 Sycamore Avenue, 932 La Brea Avenue, and La Brea alley and Willoughby Avenue.

¹⁴³ July 21, 2014 at 11:26 AM, 11:44 AM, and 12:01 PM.

¹⁴⁴ The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental noise measurement instrumentation. The meter

Additional noise measurements were also taken previously on June 12, 2014.¹⁴⁵ Predominant noise was caused by motor vehicles traveling on adjacent arterials, particularly La Brea Avenue and Willoughby. As shown in Table 3.12-2, ambient noise levels ranged from 62.6 dBA L_{eq} at nearby homes on 7118 Willoughby Avenue, to 69.7 dBA L_{eq} at the La Brea Gateway Project Site, to 75.7 dBA L_{eq} at the 860 Sycamore Avenue residence.

Construction activities would generate noise that would vary over the 21 months of activity on- and off-site, and would include on-site equipment such as scrapers, tractors, loaders and smaller equipment such as saws, hammers, and pneumatic tools. Audible increases in ambient noise of 5 dBA or more are projected at three of the four monitoring locations. First, maximum noise levels of up to 77.7 dBA are projected at the La Brea Gateway project in the future. In the absence of attenuating factors, an increase of up to 8.0 dBA at the future residences at La Brea Gateway is possible. Second, the Mole-Richardson facility to the east of the Project Site could experience audible construction noise, where noise levels will increase 6.0 dBA L_{eq} at the outside of the facility. While this increase outside the facility would be audible and potentially significant, its impact on the audition and casting activities inside the building will be attenuated, assuming doors and windows are closed and attenuate exterior noise. Finally, the residence at 7118 Willoughby could experience increases of 5.8 dBA at its location while noise levels at 860 Sycamore Avenue would increase negligibly by 0.5 dBA L_{eq} . These construction-related noise impacts would exceed the 5 dBA increase considered noticeable and are considered significant but mitigable.

**Table 3.12-2
Construction Noise Levels - Unmitigated**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Multi-family residences, 915. La Brea Ave.	100	77.0	69.7	77.7	8.0
Residence at 7118 Willoughby Ave.	220	67.1	62.6	68.4	5.8
Mole-Richardson, 937 North Sycamore Ave.	95	74.4	69.7	75.7	6.0
Residence at 860 Sycamore Ave.	245	66.2	75.7	76.2	0.5

Source: DKA Planning, 2014.

All Project impacts can be reduced below significance thresholds at all four sensitive receptor locations. Use of sound muffling equipment on construction equipment would reduce ambient noise from

was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground. Weather conditions were clear with negligible wind.

¹⁴⁵ At 925 La Brea Avenue and 7118 Willoughby Avenue. June 12, 2014 at 1:45 PM and 2:04 PM

construction equipment by 3 dBA at 50 feet of distance, producing minimal increases in ambient noise at the three potentially impacted nearby receptors.¹⁴⁶ Implementation of **Mitigation Measures 12-1** through **12-4** would address any audible increases in noise at these receptors and ensure local residents and employees are alerted to how any nuisance noise can be remedied.

Mitigation Measures

Construction Phase

- 12-1** The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.
- 12-2** The construction staging area shall be as far from sensitive receptors as possible.
- 12-3** The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices capable of attenuating sound by 3 dBA or more.
- 12-4** Two weeks prior to commencement of construction, notification shall be provided to the off-site residential uses within 500 feet of the Project Site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.

Impacts After Mitigation

Construction equipment could produce intermittent audible noise increases at these nearby sensitive receptors; however, these impacts would be temporary. As shown in Table 3.12-3, construction noise increases after mitigation would be reduced at nearby sensitive receptors to less than a 5 dBA with implementation of **Mitigation Measures 12-1** through **12-4**.

With regard to off-site construction-related noise impacts, haul trucks would generate noise from the net export of 30,000 cubic yards of export of earth materials from the Project Site, along with the demolished structures. Depending on the capacity of trucks, this could produce about 3,000 haul trips that add incremental traffic volumes to local roads during the grading phase of construction. This addition of truck trips would marginally increase ambient noise along haul route roadways, as truck deployment onto

¹⁴⁶ FHWA guidance estimates that optimized mufflers can reduce ambient noise by up to 10 dBA at 50 feet http://www.fhwa.dot.gov/environment/noise/construction_noise/special_report/hcn04.cfm

local streets would not happen simultaneously, but rather be phased over the course of the demolition, site preparation, and grading phases.

**Table 3.12-3
Construction Noise Levels - Mitigated**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Multi-family residences, 915. La Brea Ave.	100	71.0	69.7	73.4	3.7
Residence at 7118 Willoughby Ave.	220	64.1	62.6	66.4	3.8
Mole-Richardson, 937 North Sycamore Ave.	95	71.4	69.7	73.7	4.0
Residence at 860 Sycamore Ave.	245	63.2	75.7	75.9	0.2

Source: DKA Planning, 2014.

Operational Phase Noise Impacts

During Project operations, the development would produce both direct noise impacts on the site from residential- and commercial-related activities, as well as indirect noise impacts from vehicles traveling on local roads to access the site. The direct impacts would include stationary noises from sources associated with building operations, such as heating, ventilation, and air conditioning (HVAC) systems. Section 41.40 and Chapter XI, Articles 1 through 6, of the LAMC requires that noise generated by mechanical equipment not exceed 5 dBA above ambient noise levels at adjacent property lines. Large ground level heating, ventilation, and air conditioning (HVAC) systems typically generate noise levels between 50 and 65 dBA at 50 feet.¹⁴⁷ Roof-top mounted equipment typically produces noise levels of up to approximately 56 dBA at 50 feet. The nearest land uses would be Mole-Richardson facility and the residences in the La Brea Gateway located directly west of the Project Site, where ambient noise levels would not increase at all. This increase is considered inaudible and less than the 5 dBA significance threshold for long-term ambient noise increases. Therefore, stationary noise would be considered a less-than-significant impact.

Finally, long-term noises from any parking garages would be negligible, as parking would be located in a subterranean garage. This should produce a net reduction in parking-related noise, as the current site includes surface level parking that produces occasional audible noise at the Project Site from vehicles entering and exiting the premises along with parking lot related noises (e.g., closing of car doors). However, there could be noise from vehicles using the parking ramps. Therefore, **Mitigation Measure 12-5** would be required and parking noise would be less-than-significant.

¹⁴⁷ Los Angeles Department of City Planning, San Pedro Community Plan Draft EIR, August 2012.

The majority of operational noise impacts would be from indirect noise impacts associated with the 2,072 net new vehicle trips each day.¹⁴⁸ The impact of this additional traffic on ambient noise levels in the Project’s vicinity was modeled under existing year (2014) no project scenario, existing year (2014) plus project scenario utilizing the FHWA TNM 2.5 model. As shown in Table 3.12-4, the greatest project-related noise increases would be 0.1 dBA L_{eq} along La Brea Avenue between Romaine and Willoughby and between Melrose and Waring during the AM peak hour, and 0.1 dBA L_{eq} at Formosa between Santa Monica and Romaine and Highland between Santa Monica and Romaine during the PM peak hour. These negligible increases in auto-related ambient noise are considered inaudible. Mobile noise generated by the proposed Project would not cause the ambient noise level measured at the property line of the affected uses to rise to the “normally unacceptable” or “clearly unacceptable” category or result in any 5 dBA or more increase in noise level. As a result, these inaudible, off-site vehicular noise impacts would be considered a less-than-significant impact. Operational noise impacts would be less than significant, with **Mitigation Measure 12-5** to address potential parking structure ramp noise.

Mitigation Measure

Operational Phase

12-5 Increased Noise Levels (Parking Structure Ramps)

- Concrete, not metal, shall be used for construction of parking ramps.
- The interior ramps shall be textured to prevent tire squeal at turning areas.
- The walls of the parking garage adjacent to residentially zoned or used properties shall be enclosed.

**Table 3.12-4
Estimated Peak Hour Mobile Source Noise Levels**

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2014)	With Project (2014)	Project Change	Significant Impact?
Formosa Avenue, between Santa Monica and Romaine	AM	61.4	61.4	0.0	No
	PM	63.6	63.7	0.1	No
La Brea Avenue between Romaine and Willoughby	AM	69.4	69.5	0.1	No
	PM	69.9	70.0	0.1	No

¹⁴⁸ Overland Traffic Consultants, *Traffic Impact Analysis for a Mixed-Use Project Located at 904-932 La Brea Avenue*. July 2014.

**Table 3.12-4
Estimated Peak Hour Mobile Source Noise Levels**

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2014)	With Project (2014)	Project Change	Significant Impact?
La Brea Avenue between Melrose and Waring	AM	70.6	70.7	0.1	No
	PM	70.9	70.9	0.0	No
Highland Avenue between Santa Monica and Romaine	AM	71.8	71.8	0.0	No
	PM	71.4	71.5	0.1	No

Source: DKA Planning, 2014.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant with Mitigation Incorporated. Vibration is an oscillatory motion through a solid medium in which the motion’s amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Common vibration sources include trains, buses, and construction activities.

Vibration Definitions

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.¹⁴⁹

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-

¹⁴⁹Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans, which is around 65 RMS.¹⁵⁰ Most perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration are construction equipment, trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is typically not perceptible.

Applicable Regulations

To counter the effects of ground-borne vibration, the Federal Transit Administration (FTA) has published guidance relative to vibration impacts. This guidance is used in the absence of more specific Site or local guidance on vibration analysis. According to the FTA, non-engineered timber and mason buildings can be exposed to ground-borne vibration levels of 0.2 inches per second without experiencing structural damage, while reinforced-concrete, steel, or timber buildings can be exposed to ground-borne vibration levels of 0.5 inches per second.¹⁵¹ The FTA has also established guidelines that provide thresholds for ground-borne vibration causing human annoyance. For residential land uses, which experience occasional events (rather than infrequent events) of ground-borne vibration or noise, the FTA has established a threshold of 75 VdB.¹⁵² Some commercial buildings, such as auditoriums and theaters have additional vibration and noise annoyance criteria. In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to groundborne vibration. While the Los Angeles County Code (LACC Section 12.08.350) states a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to groundborne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, the FTA and California Department of Transportation's (Caltrans) adopted vibration standards for buildings are used to evaluate potential impacts related to Project construction.¹⁵³ Based on these standards, impacts relative to groundborne vibration would be considered significant if the following were to occur:

¹⁵⁰ *Ibid.*

¹⁵¹ *Ibid.*

¹⁵² *Ibid.*

¹⁵³ California Department of Transportation, "Transportation- and Construction-Induced Vibration Guidance Manual." June 2004.

- Project construction activities would cause a PPV groundborne vibration level to exceed 0.5 inches per second at any off-site reinforced-concrete, steel, or timber structure;
- Project construction activities would cause a PPV groundborne vibration level to exceed 0.2 inches per second at any non-engineered timber and masonry buildings (i.e., “fragile” buildings);¹⁵⁴ and
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 inches per second at any building that is extremely susceptible to vibration damage (i.e., “extremely fragile” buildings).¹⁵⁵

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for groundborne vibration impacts. Therefore, this analysis uses the FTA’s vibration impact thresholds for human annoyance for long-term operational activities. These are categorized as infrequent events (rather than occasional events). The thresholds include 80 VdB at residences and buildings where people normally sleep (e.g., nearby residences) and 83 VdB at institutional buildings, which includes schools and churches.¹⁵⁶ No thresholds have been adopted or recommended for commercial and office uses. Table 3.12-5, Vibration Source Levels for Construction Equipment, identifies PPV and RMS velocity (in VdB) levels for the types of off-road and on-road equipment that could operate at the Project Site during construction. No thresholds have been established for short-term annoyance from temporary construction activities. Because any impacts are temporary, construction vibration impact analysis focuses on the potential for structural damage from construction-related vibration.

**Table 3.12-5
Vibration Source Levels for Construction Equipment**

Equipment	Approximate ppv (in/sec)					Approximate rms				
	25 ft	50 ft	60 ft	75 ft	100 ft	25 ft	50 ft	60 ft	75 ft	100 ft
Large bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

RMS velocity in decibels (VdB) re 1 micro-inch/second
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.

¹⁵⁴ *Ibid.*

¹⁵⁵ *Ibid.*

¹⁵⁶ *Ibid.* Also Federal Transit Administration, “Transit Noise and Vibration Assessment” May 2006

Construction Vibration Impacts

Groundborne vibration generated by construction activities associated with the proposed Project would primarily affect the off-site sensitive uses located in close proximity to the Project Site. As shown in Table 3.12-5, vibration velocities could range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source activity, with corresponding vibration levels ranging from 58 VdB to 87 VdB at 25 feet from the source activity, depending on the type of construction equipment in use.

Vibration velocities projected to occur at the nearest off-site sensitive receptor would produce up to a 0.023 PPV at the Mole-Richardson facility an operating studio training facility for the entertainment industry. This noise-sensitive use is housed in an enclosed, one-story building across the alley behind the Project Site. This PPV is far below the 0.2 inches per second that are considered potentially harmful levels of vibration for a non-engineered timber or masonry building.

Table 3.12-6 summarizes the peak particle velocity and vibration levels that would occur at these off-site sensitive uses during construction at the Project Site. Potential vibration at the future La Brea Gateway building could reach 0.021 PPV, far below the 0.5 PPV standard for structurally-reinforced buildings. Existing residential buildings that are as close as 225 feet from the Project Site (on Willoughby Avenue) would experience a PPV groundborne vibration level of 0.007 inches per second, well below the 0.12 inches per second for buildings that are considered to be either “fragile” or “extremely fragile” buildings. Thus, vibration impacts associated with building damage due to construction activities at the Project Site would be less than significant and no mitigation measures are required.

In terms of human annoyance, the vibration levels experienced by the off-site sensitive receptors would range from 65 VdB at any nearby residences on Willoughby Street, to 76 VdB at the Mole-Richardson facility adjacent to the Project Site. Pursuant to FTA guidance, these vibration impacts would not exceed the 80 VdB threshold considered annoying to residences and buildings where people normally sleep, or the 83 VdB at institutional buildings. Further, any annoyance would be temporary and would not be evaluated against FTA standards that are generally applied to long-term operations. Construction vibration impacts would be less than significant, and no mitigation measures are required.

**Table 3.12-6
Vibration Velocities at Off-Site Sensitive Uses from Project Construction**

Sensitive Uses Off-Site	Distance to Project Site (ft)	Estimated PPV (in/sec)^a	Estimated Vibration Levels (VdB)^b
Multi-family residences at 915 La Brea Ave.	100	0.021	75
Residence at 7118 Willoughby Ave.	220	0.007	65
Mole-Richardson, 937 North Sycamore Ave.	95	0.023	76
Residence at 860 Sycamore Avenue	245	0.006	63

^a The vibration velocities at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$, where PPV_{equip} = peak particle velocity in in/sec of equipment, PPV_{ref} = reference vibration level in in/sec at 25 feet, D = distance from the equipment to the receive.

^b The vibration levels at the off-site sensitive uses are determined with the following equation from the Federal Transit Administration's Transit Noise and Vibration Impact Assessment, Final Report: $L_v(D) = L_v(25 \text{ ft}) - 30 \log(D/25)$, where L_v = vibration level of equipment, D = distance from the equipment to the receiver, $L_v(25 \text{ ft})$ = vibration level of equipment at 25 feet.

Source: DKA Planning 2014.

Operation Vibration Impacts

During operation of the Project, there would not be significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicular travel on the local roadways. Road vehicles rarely create enough groundborne vibration to be perceptible to humans unless the road surface is poorly maintained and there are potholes or bumps. If traffic, typically heavy trucks, induces perceptible vibration in buildings, such as window rattling or shaking of small loose items, then it is most likely an effect of low-frequency airborne noise or ground characteristics. Project-related traffic would expose nearby residential land uses and other sensitive receptors during long-term operations to a vibration level far less than 75 VdB and would be considered less-than-significant.

Land Use Compatibility (Proposed Residential Uses)

The existing and future noise environment could impact future residents of the proposed Project. Noise measurements conducted over a 24-hour period¹⁵⁷ showed ambient noise levels of 67 dB L_{eq} and 71.9 dB CNEL, primarily due to traffic on adjacent arterials (i.e., La Brea Avenue) and operation of businesses and general urban activity in the area. The CNEL measurements are a weighted measurement of ambient noise energy throughout a 24-hour period that reflects a range of noise levels throughout the day and night. These baseline ambient noise levels exceed the City's recommended noise standard of 65 dBA

¹⁵⁷ From July 14, 2014 1:30 PM to July 15, 2014 1:30 PM

CNEL and would be characterized as “normally unacceptable” by the State. This is considered a significant but mitigable impact.

Pursuant to the State’s Department of Health Services, residences should include noise insulation features in the design, such as closed windows and fresh air supply system or air conditioning. As such, **Mitigation Measures 12-6** and **12-7** are required to mitigate noise exposure impacts for future residents. Exposure of future residents to excessive ambient noise levels would be less than significant following implementation of **Mitigation Measures 12-6** and **12-7**.

Mitigation Measures

12-6 The development shall comply with the Noise Insulation Standards of Title 24 of the California Code of Regulations to ensure an acceptable interior noise environment.

12-7 All exterior walls, including exterior windows of proposed residential units, shall be built with construction assemblies having a minimum Sound Transmission Class (STC) 35 for units facing toward La Brea Avenue and a minimum STC 30 for units facing Willoughby Avenue, as needed to meet a 45 dBA (CNEL) level for the interior of residential units.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The majority of any long-term noise impacts will come from traffic traveling to and from the area. Off-site noise generated by traffic from the Project was modeled under future year (2018) no project and with project conditions utilizing the FHWA TNM 2.5 model. When calculating future noise levels along project area roadways from traffic, additional impacts from 54 additional related projects were considered. Thus, the future traffic results without and with the proposed Project account for the cumulative impacts from these other projects. Since the noise impacts are generated directly from the traffic analysis results, the future without project and future with project noise impacts described in this report already reflect cumulative impacts.

The Project would contribute to future increases in off-site noise levels at project area roadways. Table 3.12-7 present the cumulative increase in future traffic noise levels at study intersections. As shown, the greatest project-related noise increases would be 0.1 dBA L_{eq} along two local roadways during the AM peak hour, and 0.2 dBA L_{eq} on La Brea Avenue between Melrose and Waring during the PM peak hour. These impacts are considered negligible and would be less than the 5 dBA significance threshold. Therefore, the Project’s individual and cumulative mobile source noise impacts would be considered less-than-significant.

**Table 3.12-7
Estimated Cumulative Peak Hour Mobile Source Noise Levels**

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2018)	With Project (2018)	Project Change	Significant Impact?
Formosa Avenue between Santa Monica and Romaine	AM	62.3	62.3	0.0	No
	PM	64.6	64.6	0.0	No
La Brea Avenue between Romaine and Willoughby	AM	70.3	70.4	0.1	No
	PM	71.3	71.3	0.0	No
La Brea Avenue between Melrose and Waring	AM	71.3	71.4	0.1	No
	PM	71.6	71.8	0.2	No
Highland Avenue between Santa Monica and Romaine	AM	72.6	72.6	0.0	No
	PM	72.3	72.3	0.0	No

Source: DKA Planning, 2014.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant with Mitigation Incorporated. Construction of the Project would contribute to cumulative noise levels. In addition to ambient growth in traffic, three construction projects near the Project Site were identified as a potential contributor of audible noise at study sensitive receptors should construction be done concurrently with the Project. The nearest related projects to the Project Site are:

- No. 15 – 915 La Brea (La Brea Gateway), an under construction project of apartments and market.
- No. 37 – 936 La Brea, a renovation and expansion of office and retail uses.
- No. 54 – 925 La Brea, an office and retail project.

Related Project No. 15 is already under construction and expected to be occupied in the late 2015. As such, it has already been subject to CEQA analysis with mitigation measures to reduce impacts. Related Project No. 37 would be located adjacent to the north of the Project Site. It is an existing building that is being renovated/expanded. Related Project No. 54 would be located across La Brea Avenue and the Project Site, at a distance approximately the same as Related Project No. 15 (which would be adjacent to

No. 54). This Project is being evaluated in ENV-2014-2078 by the City and would not result in significant impacts on noise.¹⁵⁸

These related projects would be subject to the City’s noise ordinance, which limits the hours of allowable construction activities and the extent to which direct noise impacts can affect adjacent land uses. Table 3.12-8 summarizes cumulative construction noise levels from any concurrent construction of the Project and nearby related projects. If all nearby projects were built simultaneously, residents at 7118 Willoughby Avenue would experience a temporary increase in ambient daytime noise of 13.4 dBA L_{eq} . In addition, the Mole-Richardson facility and residence at 860 Sycamore Avenue would experience elevated noise levels of 7.3 and 7.2 dBA, respectively. These impacts would exceed the 5 dBA increase considered to be audible and would be considered significant but mitigable.

**Table 3.12-8
Cumulative Construction Noise Levels - Unmitigated**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Multi-family residences, 915. La Brea Ave.	100	66.7	75.7	76.2	0.5
Residence at 7118 Willoughby Ave.	220	82.9	69.7	83.1	13.4
Mole-Richardson, 937 North Sycamore Ave.	95	76.1	69.7	77.0	7.3
Residence at 860 Sycamore Ave.	245	68.9	62.6	69.8	7.2

Source: DKA Planning, 2014.

As shown in Table 3.12-9, the increase in cumulative construction noise levels after implementation of **Mitigation Measures 12-1** through **12-4** would be reduced at nearby sensitive receptors to less than 5 dBA. With each related project using exhaust mufflers on construction equipment and installing noise barriers to address direct noise impacts from their relative sites as needed to reduce incremental noise impacts on local receptors, cumulative construction noise would not increase ambient noise levels more than 5 dBA. This is partially due to the fact that there are many intervening structures in the area, and noise does not travel far due to these intervening structures blocking and dispersing noise. Therefore, implementation of **Mitigation Measures 12-1** through **12-4** would reduce impacts as a result of cumulative construction noise to less than significant.

¹⁵⁸ Page 4-18, <http://cityplanning.lacity.org/staffrpt/mnd/ENV-2014-2078.pdf>

**Table 3.12-9
Cumulative Construction Noise Levels - Mitigated**

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Multi-family residences, 915. La Brea Ave.	100	63.7	75.7	76.0	0.3
Residence at 7118 Willoughby Ave.	220	72.8	69.7	74.5	4.8
Mole-Richardson, 937 North Sycamore Ave.	95	72.3	69.7	74.2	4.5
Residence at 860 Sycamore Ave.	245	64.3	62.6	66.6	4.0

Source: DKA Planning, 2014.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The Project is not within an airport hazard area.¹⁵⁹ The Project Site is not located within two miles of a public airport. The nearest airports are Los Angeles International Airport (LAX) located 10.5 miles southwest, Santa Monica Airport located 8 miles southwest, Bob Hope-Burbank Airport located 7.5 miles north. As such, the Project would not expose future residents or employees to excessive airport-related noise levels.

- f) **For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

No Impact. The Project Site is not in the vicinity of a private airstrip. As a result, the Project will not expose future residents or employees to excessive noise levels from any private airstrip.

¹⁵⁹ City of Los Angeles Department of City Planning, Zoning Information and Map Access System, search for 925 La Brea, website: <http://zimas.lacity.org/>.

13. POPULATION AND HOUSING

- a) **Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

Less Than Significant Impact. A significant impact would occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction Impacts

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts will not result from construction of the Project. Therefore, construction-related population growth impacts will be less than significant.

Operational Impacts

Population generation is shown in Table 3.13-1 and employee generation is shown in Table 3.13-2. It is estimated that the Project would generate approximately 475 residents and approximately 30 employees (net after the removal of the existing use). The population estimate is conservatively based on the average household size Citywide, which includes all types and sizes of housing. Given most of the units are studio and 1-bedroom loft units, the population would be well within this estimate.

**Table 3.13-1
Project Estimated Population Generation**

Land Use	Quantity	Population Generation Rates	Total Population
Existing Uses			
Residential (removed)	0 DU	2.81 person / DU	0
Project			
Residential	169 DU	2.81 person / DU	475
Total Increase in Population			475
<i>Note: DU = dwelling unit</i> <i>Source: The 2010 Census also shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf.</i> <i>Table: CAJA Environmental Services, September 2014.</i>			

**Table 3.13-2
Project Estimated Employment Generation**

Land Use	Size	Employee Generation Rates	Total Employees
Existing (to be removed)			
Storage	16,255 sf	1,094 sf / employee	15
Project			
Retail	37,385 sf	836 sf / employee	45
Total Increase in Employees (Proposed – Existing)			30
<i>Note: sf = square feet</i> <i>Source: Table 3B, Derivation of Square Feet per Employee based on median employees per acre in Los Angeles County, Employee Density Study Summary Report, October 2001, Prepared for Southern California Association of Governments. The use of median as opposed to average is to reduce the impact of outliers.</i> <i>Storage is using the “Warehouse” rate.</i> <i>Retail is using the “Other Retail/Service” rate, as opposed to “Regional Retail” rate, given that the Project is not considered a regional center project.</i> <i>Table: CAJA Environmental Services, October 2014.</i>			

Localized Growth Forecasts

The following tables provide different geographic scales of population and housing, from the acutely localized census tracts, to wider community plan and also citywide. This acknowledges that growth does not occur in a vacuum but in a larger context.

Table 3.13-3 shows the Southern California Association of Government’s (SCAG) planned growth of the City of Los Angeles in population, housing, and employment from 2012 to 2020.¹⁶⁰

Table 3.13-4, Census 2010 Population, shows the 2010 population for the Census tract of the Project Site and tracts immediately around the Project Site.

Table 3.13-5 shows the population and housing for the City in 2010 and 2014.¹⁶¹

**Table 3.13-3
SCAG Population, Housing and Employment of the City of Los Angeles**

	Population	Housing (units)	Employment (jobs)
2012	3,825,297	1,418,581	1,688,584
2020	3,991,700	1,455,700	1,817,700
Change (2012-2020)	+166,403	+37,119	+29,116
2012: SCAG Local Profile for City of Los Angeles, dated May 2013: http://www.scag.ca.gov/Documents/LosAngeles.pdf			
2020: SCAG Adopted 2012 RTP Growth Forecast, adopted April 2012: http://www.scag.ca.gov/DataAndTools/Pages/GrowthForecasting.aspx			
Table: CAJA Environmental Services, May 2014.			

**Table 3.13-4
Census 2010 Population**

Tract	Block	Location	Population	Housing Units
1919.01	1014	Contains Project Site	1	0
1919.01	1012	Adjacent northeast of the Project Site	3	0
1919.01	1013	Adjacent north of the Project Site	0	0
1919.01	1015	Adjacent east of the Project Site	19	14
1919.02	1003	Adjacent south of the Project Site	52	30
1919.02	1002	Adjacent southeast of Site	128	74
1920.01	2000	Adjacent west of the Project Site	0*	0*

¹⁶⁰ The 2012 data was from a May 2013 report and profile. The 2020 projection was from the 2012 RTP adopted April 2012.

¹⁶¹ State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State—January 1, 2011-2014. Sacramento, California, May 2014:
<http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>

**Table 3.13-4
Census 2010 Population**

Tract	Block	Location	Population	Housing Units
1920.01	2003	Adjacent southwest of Site	61	44
Total			264	162

*NavigateLA with Census 2010 layer: <http://navigatela.lacity.org/index01.cfm>
Census 2010 for Los Angeles County: <http://www.census.gov/2010census/popmap/ipmtext.php?fl=06>
*Note that Tract 1920.01 currently contains no residences and population. However, the under construction La Brea Gateway will add 179 residential units (approximately 388 persons).
Table: CAJA Environmental Services, July 2014.*

**Table 3.14-5
Population and Housing in the City Los Angeles**

	2010	2014	Change 2010-2014
Population	3,792,621	3,904,657	+112,036
Housing Units	1,412,006	1,432,553	+20,547

*2010: Census data, reported 4/1/2010
2014: Estimate 1/1/2014. State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties and the State—January 1, 2011-2014. Sacramento, California, May 2014: <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>
Table: CAJA Environmental Services, July 2014.*

The September 2014 unemployment rate in the Los Angeles-Long Beach-Glendale area is approximately 7.8 percent.¹⁶² Thus, there is still potential for employment capacity (jobs) to increase to fulfill demand. The Project would generate approximately 475 residents and a net of 30 employees. The Project would not conflict with SCAG’s projections, the City’s projections, or represent any significant population or housing increase. The additional residents and housing units represent 0.33 percent and 0.8 percent, respectively of the City’s anticipated growth from 2012 to 2020 according to SCAG. As discussed in the Air Quality and Utilities and Service Systems sections of this IS/MND, the Project is consistent with SCAG’s growth projections which are based on macroeconomic data and socioeconomic variables independent of parcel-level land use designation and zoning. The Project would represent a negligible percent of the estimated 2014 population and housing units in the City (according to the Department of Finance). The Project is not of the size and scope that it would induce substantial population growth and

¹⁶² Bureau of Labor Statistics: http://www.bls.gov/eag/eag.ca_losangeles_md.htm

is not a project of statewide, regional, or areawide significance, according to CEQA Guidelines Section 15206(b). The Project would be less than significant impact to population and housing growth.

Housing Element

The City updated its Housing Element portion of the General Plan for the period of 2013-2021. On December 3, 2013, the City Council adopted the update to the Housing Element of the General Plan.¹⁶³ The Housing Element provides the number of housing units each community must plan and accommodate during the 8-year period is called the Regional Housing Needs Assessment (RHNA) allocation. The Housing Element does not alter the development potential of any site in the City, nor modify land use of the Zoning Code. It also does not undermine, in any way, neighborhood planning efforts such as Community Plans, Specific Plans or Historic Preservation Overlay Zones. While the State requires the City to evaluate and plan for the existing capacity to accommodate future projected growth, the Housing Element does not have any material effect on development patterns, nor specify areas for increased height or density.¹⁶⁴ The Housing Element has identified 2,024 sites (662.1 acres) in the Hollywood Community Plan Area as having the housing capacity for 24,185 net units.¹⁶⁵

The Project Site does not currently contain housing. The Project would add 169 housing units and not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.¹⁶⁶ Thus, the Project would contribute toward the City's RHNA allocation.

Infrastructure Impacts

The Project Site is currently developed with buildings and is located within an urbanized area in the City. Thus, the construction of potential growth-inducing roadway or other infrastructure extensions would not be required. The Project would not induce substantial population growth and would be supported by the existing infrastructure such as roadways. Impacts will be less than significant.

¹⁶³ City of Los Angeles, Housing Element, 2013-2021: <http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm>

¹⁶⁴ City of Los Angeles, Housing Element, 2013-2021: <http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm>

¹⁶⁵ City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.

¹⁶⁶ City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing housing. Therefore, no impact will occur.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing occupied housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing housing. Therefore, no impact will occur.

14. PUBLIC SERVICES

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

E-1 Response from Los Angeles Fire Department, July 15, 2014.

E-2 Response from Los Angeles Police Department, July 22, 2014.

E-3 Response from Los Angeles Unified School District, July 7, 2014

E-4 Response from Los Angeles Department of Recreation and Parks, July 29, 2014.

E-5 Response from Los Angeles Public Library, July 30, 2014.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:

i) Fire protection?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project, and a new or physically altered fire station would be necessary. LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed.

A total of 1,104 uniformed firefighters (included 242 serving as Firefighters/Paramedics), are always on duty at 106 neighborhood fire stations located in the LAFD's 471-square-mile jurisdiction.¹⁶⁷ Pursuant to Table 507.3.3 of the 2014 Fire Code, the maximum response distance between high density residential and commercial land use and a LAFD station that houses an engine company¹⁶⁸ is 1.5 mile and truck company¹⁶⁹ is 2 miles, response distances that if exceeded require the installation of an automatic fire

¹⁶⁷http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf

¹⁶⁸ LAFD: All LAFD Engines are Triple Combination apparatus, meaning they can pump water, carry hose, and have a water tank: <http://lafd.org/about/apparatus>

¹⁶⁹ LAFD: Aerial Ladder Fire Engines: <http://lafd.org/about/apparatus>

sprinkler system.¹⁷⁰ The Project Site is served by several fire stations, as shown in Table 3.14-1, Fire Stations. The fire stations are shown in Figure 3.14-1, Fire Station Locations.

**Table 3.14-1
Fire Stations**

No.	Address	Distance	Equipment	Staff	Ave. Time (Turnout + Travel)	Incident Counts
41	1439 N. Gardner	1.1 miles	Engine ALS Ambulance BLS Ambulance	6 Firefighters	Non-EMS: 1:06 + 5:13 minutes EMS: 1:10 + 4:32 minutes	Non-EMS: 728 EMS: 2,550
27	1327 Cole	1.3 miles	Task Force ALS Ambulance BLS Ambulance Battalion Chief	16 Firefighters	Non-EMS: 1:00 + 3:13 minutes EMS: 1:16 + 3:50 minutes	Non-EMS: 838 EMS: 4,230
61	5821 W. 3 rd	1.5 miles	Task Force ALS Ambulance BLS Ambulance EMS Captain	15 Firefighters	Non-EMS: 1:04 + 3:40 minutes EMS: 1:11 + 4:19 minutes	Non-EMS: 957 EMS: 4,038

Incident counts: year 2014 (January to September). Non-EMS is fire emergency. EMS is emergency medical service.
Response Time: year 2014 (January to September) average time (turnout time + travel time) in the station area.
Response time listed above does not include call processing, which averages 1:17 minutes citywide in 2014. Call processing is done at a central location and does not differ by fire stations.
Fire Department Call Processing Time: The time interval that starts when the call is created in CAD by a Fire Dispatcher until the initial Fire or EMS2 unit is dispatched. Turnout Time: The time interval between the activation of station alerting devices to when first responders put on their PPE3 and are aboard apparatus and en-route (wheels rolling). Both station alarm and en-route times are required to measure this for each unit that responds.
Travel Time: The time interval that begins when the first unit is en route to the incident and ends upon arrival of any of the units first on scene. This requires one valid en-route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events and unspecified incident locations, may impact travel time.
Incident Count: The number of incidents that result in one or more LAFD units being dispatched, regardless of record qualification.
http://lafd.org/sites/default/files/pdf_files/10-15-2014_AllStations.pdf
Source: Written correspondence with Captain Luke Milick, LAFD, July 15, 2014.
Table: CAJA Environmental Services, October 2014.

¹⁷⁰http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf

Response Distance

The Project Site is located within the distance identified by the Fire Code. Station Nos. 27 and 61 are within 1.5 miles away and contain Task Forces (truck company and engine company).¹⁷¹ The Project will be constructed with fire protection as required by the LAFD Chief, unless other building and safety codes supersede this. The LAFD goal is to reach EMS incidents within 5 minutes 90 percent of the time and fire incidents within 5:20 minutes 90 percent of the time.¹⁷²

Average (or mean) response time can be skewed with a few isolated, abnormal response times. A recommended measure is called a fractile measurement (such as 80 percent), in which performance is better measured in terms of how well the department is able to achieve the goal as compared to 100 percent of the time. For example, a department would create a performance measurement indicating fire apparatus will arrive at the scene of the dispatched incident within a certain period of time, 80 percent of the time. The distribution of response times (as measured by Incident Creation Time to Time On Scene) for emergency incidents from October 1 2012 through November 20 2013, indicates that in 86% of the incidents, the fastest response time (response time of the first unit on scene) was less than 480 seconds (8 minutes). The 90th percentile of the response time is 538 seconds (just under 9 minutes).

- Overall, EMS incidents tend to have faster responses than Fire incidents.
- EMS: The 90th percentile of response times city-wide was 534 seconds, while the 90th percentile of travel times was 357 seconds.
- Fire: The 90th percentile of response times city-wide was 564 seconds, while the 90th percentile of travel times was 409 seconds.

Travel time takes significantly longer than the other components, with a mean of 230 seconds city-wide (240 seconds in the North and West bureaus). The National Fire Protection Association (NFPA) standard is actually phrased in terms of travel time rather than response time, e.g.: “The fire department’s fire suppression resources shall be deployed to provide for the arrival of an engine company within a 240-second travel time to 90 percent of the incidents.” Travel time is much more variable than dispatch or turnout time, possibly due to the differing distances between responding resource and the incident location and traffic along the way. Furthermore, while dispatch and turnout times are largely under LAFD’s control, and can be improved through better training or process design, improving travel time requires changing resource pre-positioning (deployment). The first step in evaluating LAFD’s ability to take a structured approach to finding better deployments would be to compare actual travel times to

¹⁷¹ LAFD Task Force: <http://lafd.org/apparatus/111-fire-a-rescue-resources/295-lafd-task-force>

¹⁷² Written correspondence with Captain Luke Milick, LAFD, July 15, 2014.

predicted (model-based) travel times.¹⁷³ Calls for service vary based on the days of the week and time of the day. There is also variation in fire-related or emergency medical (EMS)-related calls. Of the weekday days, Wednesdays have the lowest number of Fire calls by volume (and Thursdays the highest with Fridays close behind), and Wednesdays and Thursdays have about the same number of EMS calls by volume, the lowest among weekdays (and Fridays the highest). Sundays has the lowest number of calls by volume for both Fire and EMS. The variation between incident rates for Fire is slightly higher than incident rates for EMS calls.¹⁷⁴ The Project is within the maximum response distance of a fire station with adequate equipment. There are additional fire stations located nearby (within 1.5 miles). Impacts related to response distance would be less than significant.

Emergency Access

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site (i.e. Gardner, La Brea, and Santa Monica).

- Fire Station 41 would likely (most direct route) pass along Gardner Avenue to Santa Monica Boulevard, to La Brea Avenue.
- Fire Station 27 would likely pass along Cole Avenue to Santa Monica Boulevard, to La Brea Avenue.
- Fire Station 61 would likely pass along 3rd Street to La Brea Avenue.

The routes from the fire stations to the Project Site would likely pass through several of the study intersections, including Nos. 1 through 7, 9, and 10. Nos. 8 and 11 are not on the likely path of travel. The future (2018) traffic conditions with the Project show that none of the study intersections would have a significant impact.¹⁷⁵ All circulation would be in compliance with the Fire Code, including any access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts related to emergency access would be less than significant.

Fire Flow

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the zoning of the area, type of development, occupancy rates, life hazard, and the

¹⁷³Pages 54-59, *Fire Department Deployment Resources Study*, March 3, 2014:
<http://lafd.blogspot.com/2014/03/report-affirms-changes-underway-says.html>.

¹⁷⁴Pages 48-50, *Fire Department Deployment Resources Study*, March 3, 2014:
<http://lafd.blogspot.com/2014/03/report-affirms-changes-underway-says.html>.

¹⁷⁵ Table 10, *Traffic Impact Study*, Overland Traffic Consultants, July 2014.

degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing. The fire flow is set at 6,000 to 9,000 gpm from 4-6 fire hydrants simultaneously with 20 psi residual pressure.¹⁷⁶ The following fire hydrants are near the Project Site:¹⁷⁷

- Hydrant (ID 42131, size 2½ X4D, 8-inch main) on southwest corner of La Brea and Willoughby.
- Hydrant (ID 35492, size 2½ X4D, 6-inch main) on southeast corner of La Brea and Willoughby.
- Hydrant (ID 35493, size 2½ X4D, 6-inch main) on southwest corner of La Brea and Romaine.
- Hydrant (ID 35490, size 2½ X4D, 6-inch main) on southwest corner of Sycamore and Willoughby.

The fire main and hydrant locations will be analyzed at the plan check phase.¹⁷⁸ The Project will submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the project area is sufficient. If it is not, then upgrades to the existing infrastructure would be required. To ensure that fire protection services are adequate within the proposed buildings and around the Project Site, **Mitigation Measure 14-1** and **14-2** would reduce potential impacts on fire protection services to a less than significant level. These measures allow the LAFD to ensure that the Project will not increase demand on the fire department to the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment.

Mitigation Measures

14-1 Fire Flows and Hydrants

The Project shall submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the project area is sufficient. If it is not, then upgrades to the existing infrastructure shall be required.

14-2 Public Services (Fire)

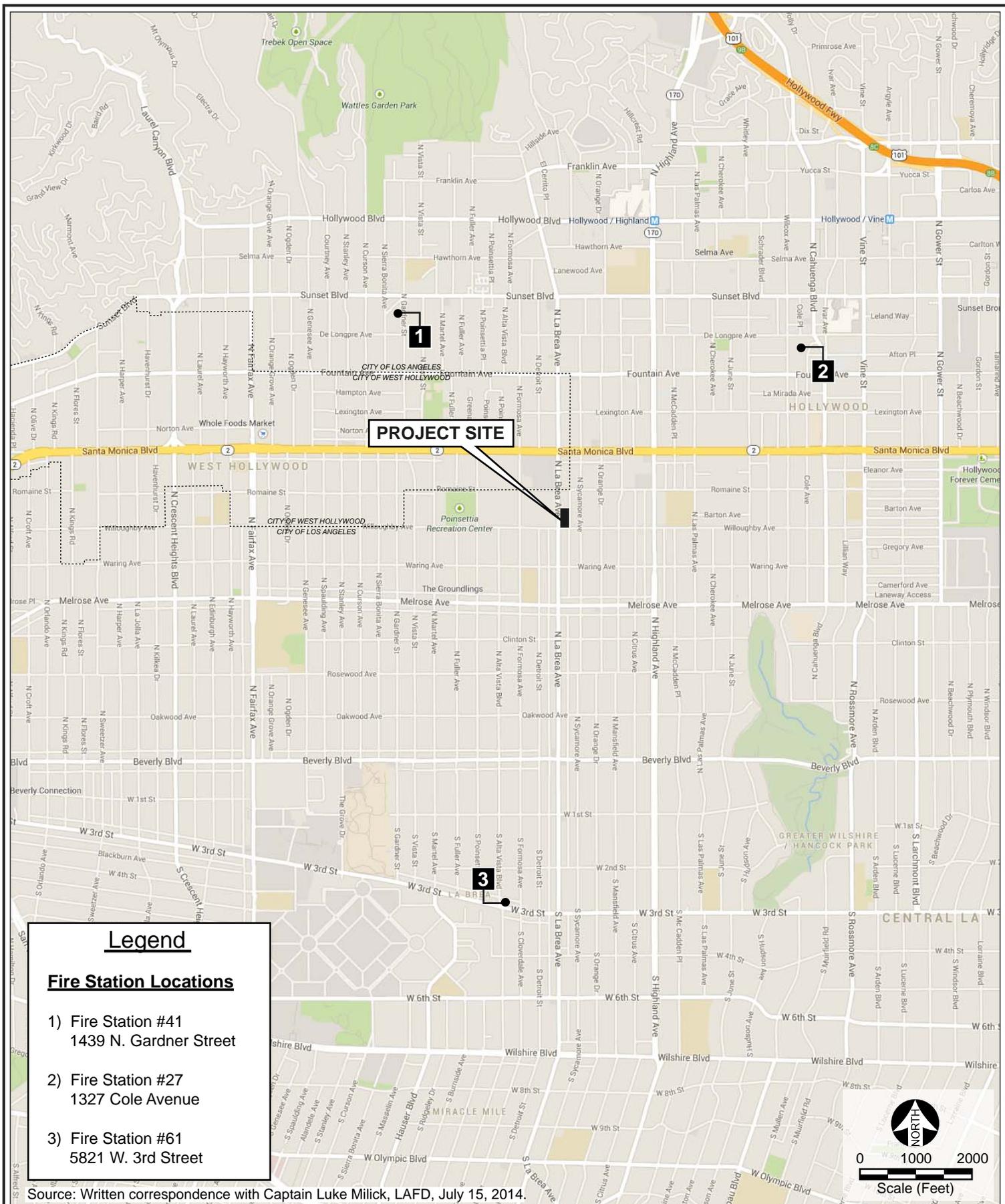
The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by

¹⁷⁶ Written correspondence with Captain Luke Milick, LAFD, July 15, 2014.

¹⁷⁷ Navigate LA, City of Los Angeles, Bureau of Engineering, DWP (Fire Hydrants) Layer: <http://navigatela.lacity.org/index01.cfm>

¹⁷⁸ Written correspondence with Captain Luke Milick, LAFD, July 15, 2014.

the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.



ii) Police protection?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. The Project Site is served by the City of Los Angeles Police Department's (LAPD) West Bureau, which oversees LAPD operations in the Hollywood, Olympic, Pacific, West LA, and Wilshire communities.¹⁷⁹

The Hollywood Community Police Station, located at 1358 Wilcox Avenue, is approximately 1.2 miles driving distance from the Project Site. The boundaries of the Hollywood Area are as follows: Mulholland Drive, Griffith Park boundary to the north; Los Angeles City boundary, Melrose Avenue to the south; Normandie Avenue, Griffith Park boundary to the east; and Los Angeles City boundary to the west.¹⁸⁰ Each police station area is divided into smaller Reporting Districts (RD). The Project Site is within RD 663 (formerly RD 665), which has an area as follows: Fountain Avenue to the north; Willoughby Avenue to the south; La Brea Avenue and Los Angeles City boundary to the west; and Seward Street to the east.¹⁸¹ The police station is shown in Figure 3.14-2, Police Station Location.

Deployment

Deployment of police officers to existing area stations in the City is based on a number of factors and is not calculated solely based on police-need-per-population standards. The LAPD presently uses a quantitative workload model, known as Patrol Plan, to determine the deployment level in each of the area stations. Patrol Plan, which was developed by a private consultant, is a computer program which mathematically formulates 25 data variables (factors) to provide patrol officer deployment recommendations for the 18 geographic areas in the City to meet predetermined constraints (response time and available time). These factors include patrol speed, number of units fielded, forecast call rate, percent of calls with 1-6+ units dispatched, average service time, dispatching policy, percent of calls dispatched by priority, square miles of an area, average travel time and street miles (length of streets, alleys and other routes in an area).

Police units are in a mobile state; hence the actual distance between the Station and the Project Site is often of little relevance to service performance. Instead the realized response time is more directly related to the number of officers deployed. Police assistance is prioritized based on the nature of a call. The average response time to emergency calls for service in the Hollywood Area during 2013 was 5.0

¹⁷⁹ LAPD, West Bureau: http://www.lapdonline.org/west_bureau

¹⁸⁰ Written response from Commander Andrew J. Smith, LAPD, July 22, 2014. Included in the Appendices.

¹⁸¹ Written response from Commander Andrew J. Smith, LAPD, July 22, 2014. Included in the Appendices.

minutes. This response time is below the Citywide average that was 5.9 minutes during 2013 and below the seven minute response time that is a set standard of the LAPD. There are approximately 361 sworn officers and 17 civilian support staff in the Hollywood Area.¹⁸²

Crime Rate

Crime statistics are shown in Table 3.14-2, Reported Crimes. The crime rate, which represents the number of crimes reported, affects the “needs” projection for staff and equipment for the LAPD to some extent. According to the LAPD, there were 65 crimes per 1,000 person in the Hollywood Area¹⁸³ and 50 crimes per 1,000 persons Citywide.¹⁸⁴ This result can be assumed a function of the high density of Hollywood area.

**Table 3.14-2
Reported Crimes**

Type of Crime	RD 663	Hollywood Area	Citywide
Murder	0	7	251
Rape	1	50	665
Robbery	33	380	7,861
Aggravated Assault	10	295	7,592
Burglary	12	373	15,572
Larceny	99	2,863	55,120
Vehicle Theft	11	420	14,112
Other Assault	62	1,519	30,818
Forgery / Counterfeit	26	98	2,683
Fraud	13	586	12,788
Embezzlement	0	13	726
Vandalism	39	815	17,971
Weapon	2	51	1,135
Pimp / Pan	0	4	66
Other Sex Offense	1	99	2,833
Against Family / Child	0	16	515
Disorderly Conduct	1	18	345
Vagrancy	4	172	1,677

¹⁸² Written response from Commander Andrew J. Smith, LAPD, July 22, 2014. Included in the Appendices.

¹⁸³ $8,309 \text{ crimes} / 128,418 \text{ persons} \times 1,000 = 65$

¹⁸⁴ $187,749 \text{ crimes} / 3,790,185 \text{ persons} \times 1,000 = 50$

**Table 3.14-2
Reported Crimes**

Type of Crime	RD 663	Hollywood Area	Citywide
All Other Violations	17	530	15,019
Total	331	8,309	187,749
<p><i>The above numbers are from the 2013 crime statistics.</i></p> <p><i>Source: Written response from Commander Andrew J. Smith, LAPD, July 22, 2014.</i></p> <p><i>Included in the Appendices.</i></p> <p><i>Table: CAJA Environmental Services, July 2014.</i></p>			

Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site to keep out the curious.

The Project Site is generally shielded from access on the north by the adjacent retail and office building. The side along La Brea Avenue, rear alley, and Willoughby Avenue will need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services (see **Mitigation Measure 14-3**). These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. This is especially important since the Project Site is located near Hollywood and West Hollywood, which has an active walking environment during the day and night. This measure would reduce potential construction impacts on police protection services to a less than significant level.

Operational Impacts

The Project would generate approximately 475 residents and approximately 30 employees (net after the removal of the existing use), as well as an increase in visitors and patrons, especially over the evening hours due to the residential and retail uses. As such, the Project could potentially increase in the number of police service calls due to an increase in onsite persons. The potential for crime can be reduced with site specific designs and features (see **Mitigation Measure 14-4**).

Existing development adjacent to the Project Site would generally shield the Project Site from trespass on its north side. The west side along La Brea Avenue would be the front public access point with additional access along Willoughby Avenue. The Project will include standard security measures such as adequate security lighting, secure access to non-public areas and separate retail access points. Parking would continue to be provided on site and would be in a parking structure with one subterranean level and 2

above ground levels. Retail parking would be accessed from La Brea and residential parking from the rear alley. The LAPD will require that the commanding officer of the Hollywood Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response (see **Mitigation Measure 14-5**). The Project will not require the construction of a new or expanded police station. **Mitigation Measures 14-3, 14-4, and 14-5** will reduce the impacts associated with police services to a less than significant level.

Mitigation Measures

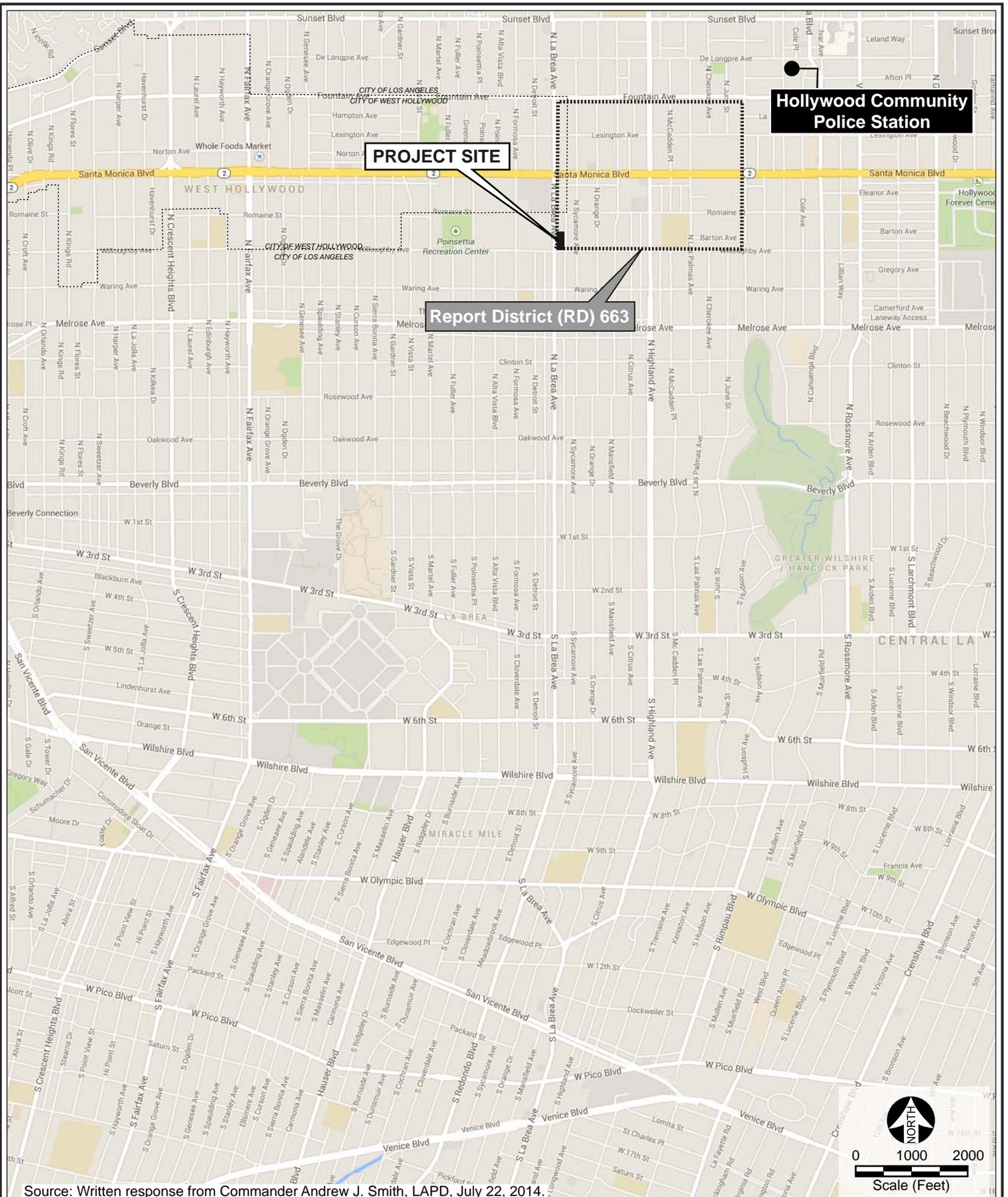
14-3 Public Services (Police – Demolition/Construction Sites)

Fences shall be constructed around the site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

14-4 Public Services (Police)

The plans shall incorporate a design that enhances the security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, and location of toilet facilities or building entrances in high-foot traffic areas. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits.

14-5 Upon completion of the Project, the Hollywood Area commanding officer shall be provided with a diagram of each portion of the property. The diagram shall include access routes and any additional information that might facilitate police response.



iii) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for additional school facilities. The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:¹⁸⁵

- Vine Street Elementary School (K-5), located at, 955 Vine Street, Los Angeles, CA 90038
- Bancroft Middle School (6-8), located at 929 N. Las Palmas Avenue, Los Angeles, CA 90038
- Fairfax High School (9-12), located at 7850 Melrose Avenue, Los Angeles, CA 90036

The schools are shown in Figure 3.14-3, School Locations.

Enrollment Capacities

Each of the schools' enrollments and capacities are shown in Table 3.14-3. There are no anticipated new schools planned for the area.

**Table 3.14-3
LAUSD Schools Enrollments and Capacities**

Name	Current Capacity ¹	Resident Enrollment ²	Actual Enrollment ³	Current Overage/ (Shortage) ⁴	Overcrowded Now? ⁵	Projected Capacity ⁶	Projected Enrollment ⁷	Future Overage/ (Shortage) ⁸	Overcrowding Future? ⁹
Vine Elementary	609	531	563	78	No	529	526	3	Yes
Bancroft Middle	939	756	876	183	No	1,334	782	552	No
Fairfax High	2,487	2,155	2,162	332	No	2,215	1,914	301	No

Note: Current and projected enrollments/capacities reflect data from School Year (SY) 2012-2013. Current and projected data are updated annually and become available after February 1st of each calendar.

¹School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet program.

²The total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.

-Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.

-A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1 TRK).

³The number of students actually attending the school now, including magnet students.

⁴Current seating overage or (shortage): equal to (current capacity) - (resident enrollment).

⁵Current overcrowding status of school or service area. The school or area is currently overcrowded if any of these conditions exist:

¹⁸⁵ Written response with Rena Perez, LAUSD, July 7, 2014. Included in Appendices.

**Table 3.14-3
LAUSD Schools Enrollments and Capacities**

Name	Current Capacity ¹	Resident Enrollment ²	Actual Enrollment ³	Current Overage/ (Shortage) ⁴	Overcrowded Now? ⁵	Projected Capacity ⁶	Projected Enrollment ⁷	Future Overage/ (Shortage) ⁸	Overcrowding Future? ⁹
<p>-A school is currently on a multi-track calendar. -There is currently a seating shortage. -There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats. ⁶ School planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a 2-semester (1 TRK) calendar. Includes capacity allocated to by charter co-locations. Includes capacity for magnet programs. ⁷ Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students. ⁸ Projected seating overage or (shortage): equal to (projected capacity) - (projected enrollment). ⁹ Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist: -A school remains on a multi-track calendar. -There is a seating shortage in the future. -There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future. Source: Written response from Rena Perez, LAUSD, July 7, 2014. Included in the Appendices. Table by CAJA Environmental Services, July 2014.</p>									

As shown on Table 3.14-4, the Project (directly through its residential units and indirectly through its employees) would generate an increase of approximately 73 elementary, 18 middle, and 37 high school students, for a total increase of approximately 128 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD. Bancroft Middle and Fairfax High have adequate capacity now and in the future (LAUSD has a 5 year projection) to accommodate the Project. Vine Elementary is projected to have 3 seats overage in the future (LAUSD considers a seating overage of less than or equal to a safety margin of 30 seats to be considered overcrowded). However, as discussed below, payment of required school fees is deemed to provide full and complete mitigation.

**Table 3.14-4
Project Estimated Student Generation**

Project		Students Generated			
Source	Quantity	Elementary	Middle	High	Total
Residential units	169	68	17	34	119
Employees	33	5	1	3	9
Total		73	18	37	128
<p><i>Residential land uses:</i> Elementary: 0.4 students per household Middle: 0.1 students per household High: 0.2 students per household</p>					

**Table 3.14-4
Project Estimated Student Generation**

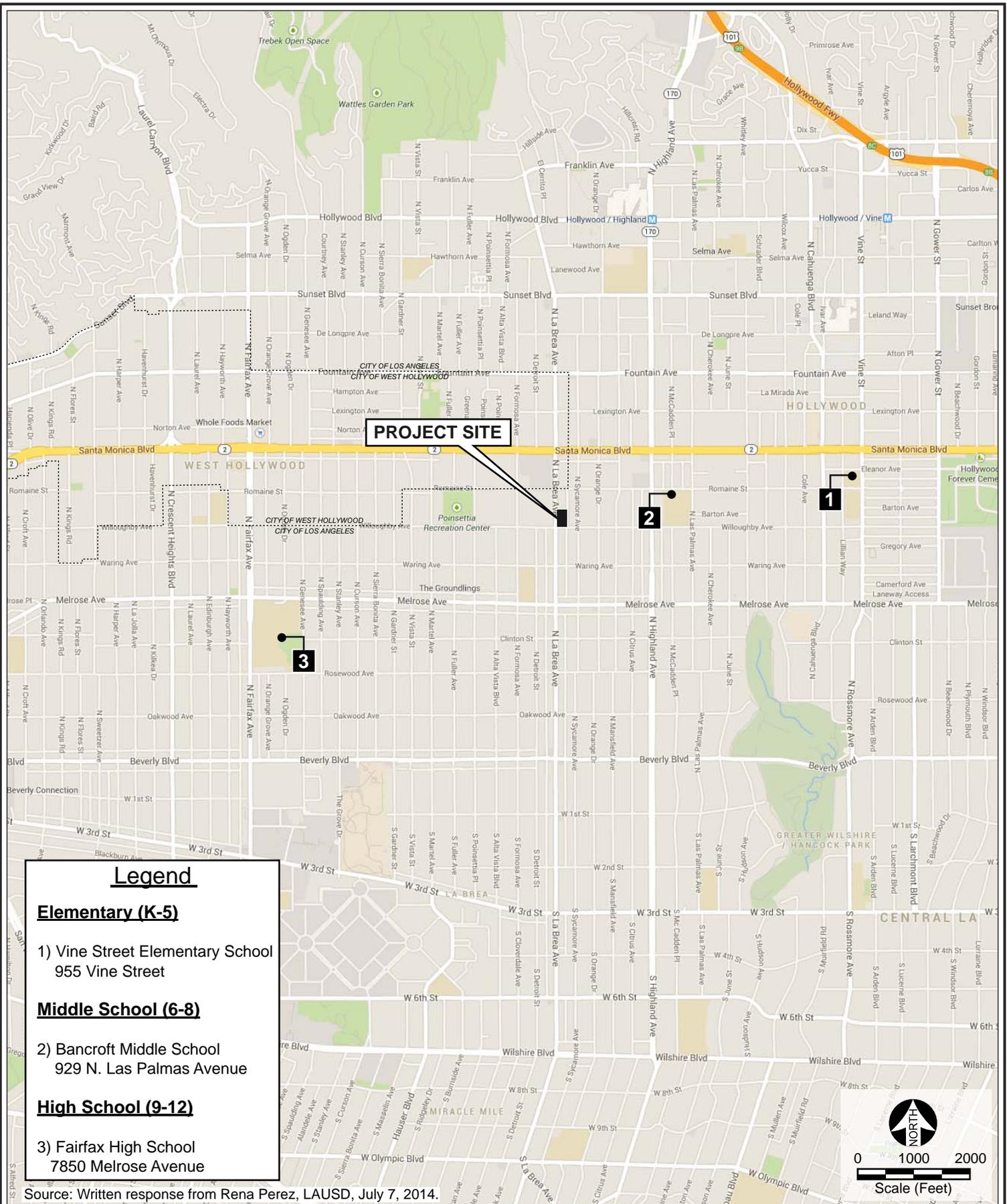
Project		Students Generated			
Source	Quantity	Elementary	Middle	High	Total
<p><i>Commercial and Industrial land uses: 0.2691 students per employee. Note that there is no breakdown by elementary, middle, or high. Therefore the same ratio as residential, 4:1:2, is used. Source (rates): LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table: CAJA Environmental Services, May 2014.</i></p>					

Proximity to Schools

The Project Site is in close proximity to several schools, the nearest being Cheder of Los Angeles, at 801 N. La Brea Avenue, approximately 550 feet southwest. The schools would be generally shielded from the Project Site by the La Brea Gateway development, Willoughby Avenue, and intervening residential and commercial buildings to the south. These intervening structures and redundant street network ensure that construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Construction activities would be limited to on-site work. Therefore, no impact would occur.

School Fees

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district’s levy of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project’s impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, impacts related to schools will be less than significant.



iv) Parks?

Less Than Significant with Mitigation Incorporated. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Element of the City’s General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons). The Hollywood Community Plan Area, within which the Project is located, has a parkland acres-to-population ratio of neighborhood and community parks of 0.41 acres per 1,000 residents.

Table 3.14-5, Parks and Recreation Centers lists the parks and recreation centers that are located nearby the Project Site. The parks are shown in Figure 3.14-4, Park and Recreation Center Locations. While the LADRP is currently in the process of implementing the 50 Parks Initiative, these are small pocket parks typically less than half an acre, often only one tenth of an acre, and have a service radius of one half mile. None of these parks will be sited within half mile from the Project Site. The LADRP does not have current plans for construction or expansion of parks and recreational facilities that have a two mile service radius within a two mile radius of the Project Site.

**Table 3.14-5
Parks and Recreation Centers**

Name	Address	Acres	Features
Neighborhood Parks (Less than 10 acres and within 1 mile of Site)			
De Longpre Park	1350 Cherokee Ave.	1.37	Playground, Open Space
Hollywood Recreation Center	1122 Cole Ave.	3.12	Auditorium, basketball, children’s play area, community room.
Las Palmas Senior Center	1820 Las Palmas Ave.	1.14	Community Center
Poinsettia Recreation Center	7341 Willoughby Ave.	6.29	Baseball, basketball, children’s play area, handball, indoor gym), tennis courts.
Yucca Community Center	6671 Yucca St.	0.97	Basketball, children's play area, picnic table, soccer
Community Parks (greater than 10 acres and within 2 miles of Site)			
Pan Pacific Park	7600 Beverly Blvd.	32.18	Auditorium, barbecue, baseball, basketball children’s play area, indoor gym, picnic tables
Wattles Garden Park	1850 Curson Ave.	47.58	Community garden, hiking trails, Japanese garden, mansion, stream/brook, tea house
Regional Parks (greater than 50 acre and within 2 miles of Site)			
Runyon Canyon Park	2000 Fuller Ave.	136.76	Children’s play area, hiking trail, off-leash dog area
<p><i>Written response from Michael Shull, General Manager, Los Angeles Recreation and Parks Department, July 29, 2014. NavigateLA with Recreation and Parks Department layer: http://navigatela.lacity.org/index01.cfm Table: CAJA Environmental Services, August 2014.</i></p>			

The Project would generate approximately 475 residents and approximately 30 employees (net after the removal of the existing use). However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. Table 2-4, Open Space Required (in Section 2, Project Description), provides the amount of required open space. The Project would provide at least the code-required open space of 19,525 square feet. This would be included on Level 4 with a pool, gym, and outdoor deck, and Level 7 deck, and private balconies.

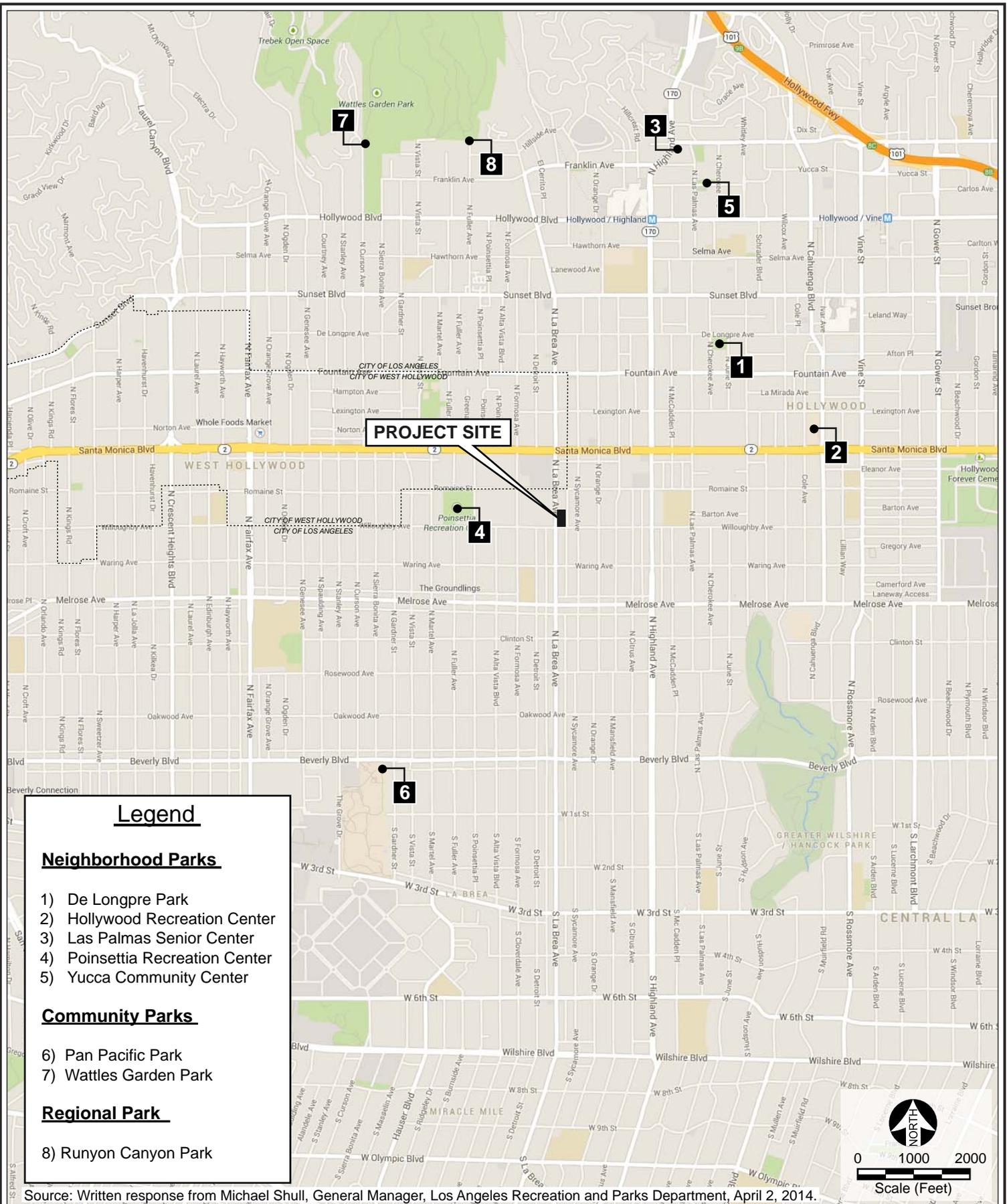
According to the standards provided in the Public Recreation Plan, the 475 net new residents would require 1.9 acres to maintain the standard of four acres per 1,000 people. The City requires developers to dedicate parkland or pay fees in lieu of parkland dedication. When the proposed onsite open space and recreation facilities do not fully satisfy the above requirements, the developer is required to pay Recreation and Park Fees to the City to satisfy the balance of its obligations.

Therefore, with implementation of **Mitigation Measure 14-6**, impacts to parks and recreation centers from the Project would be less than significant.

Mitigation Measure

14-6 Recreation (Increased Demand for Parks or Recreational Facilities)

If the applicant seeks a certificate of occupancy for apartments, then the following applies: (*Apartments*) Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.



v) **Other public facilities?**

Less Than significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the Project Site. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library 8 regional branches, and 64 community branches. The LAPL collection has 6.4 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.¹⁸⁶ On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for community with less than 45,000 population, 14,500 square feet for community with more than 45,000 population, and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. Table 3.14-6 describes the libraries that would serve the Project. The libraries are shown in Figure 3.14-5, Library Locations.

The Project would generate approximately 475 residents and approximately 30 employees (net after the removal of the existing use), which would increase the use of demands for materials. The current service population of the four libraries is approximately 208,687 persons. The Project would directly necessitate the need for a new facility. This is because the LAPL has indicated that there are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community.¹⁸⁷ Employees of commercial and office developments do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours. Thus, the Project not would impact libraries to the extent that a new facility would be required. Therefore, impacts would be less than significant, and no mitigation is required.

**Table 3.14-6
Los Angeles Public Libraries**

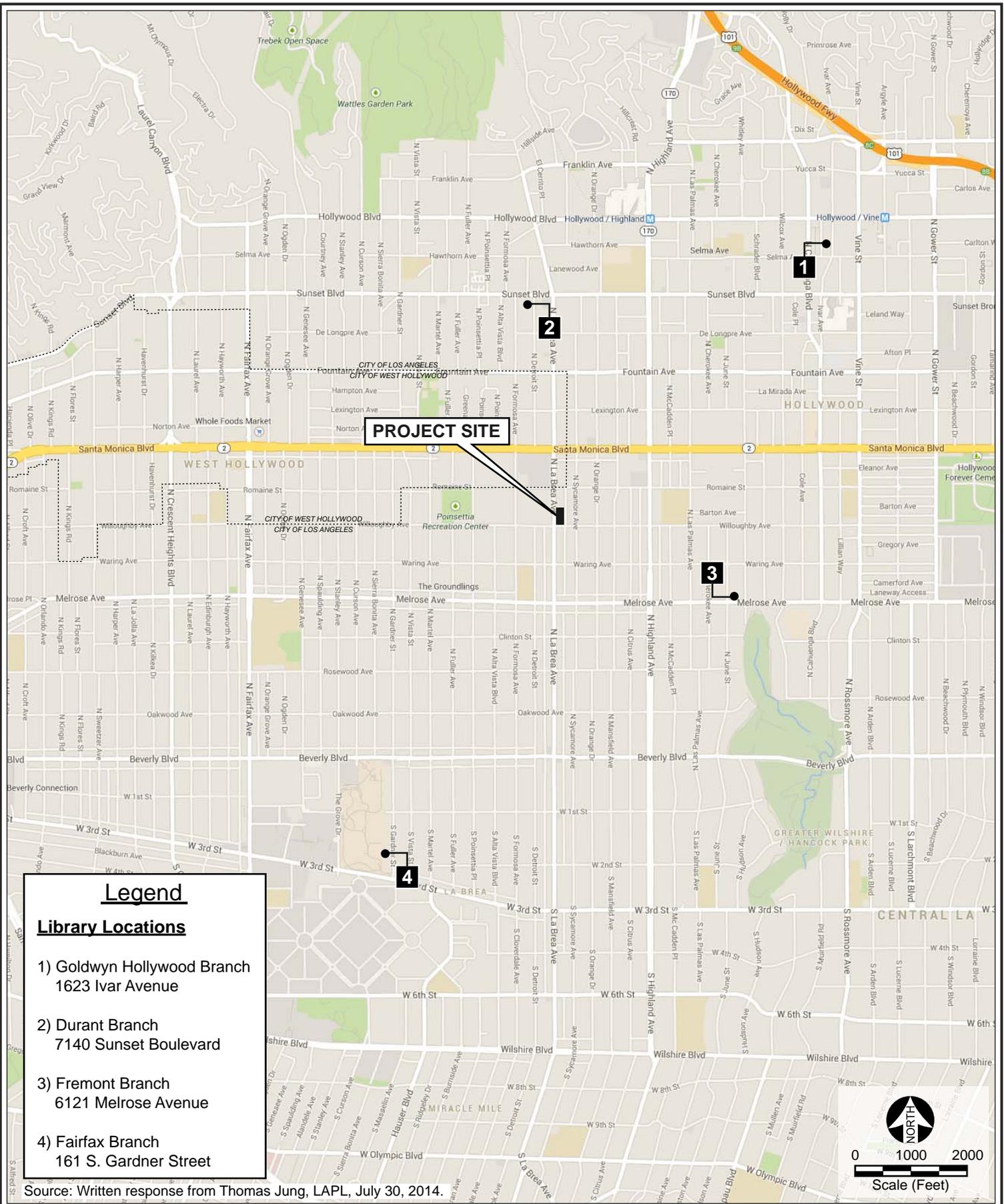
Name	Address	Size (sf)	Volumes/Circulation	Current Service	Staff
Goldwyn Hollywood Branch	1623 Ivar Ave.	19,000	87,182 / 123,539	78,944	10
Durant Branch	7140 Sunset Blvd.	12,500	47,727 / 138,968	25,657	8
Fremont Branch	6121 Melrose Ave.	7,361	40,452 / 99,181	30,896	6.5
Fairfax Branch	161 S. Gardner St.	12,500	52,262 / 209,707	73,190	8

*Staffing is full-time equivalent. Current Service – 2010 Census.
The LAPL does not make targeted projections but rather uses the most recent Census figures to determine if a branch should be constructed in a given area, according to the new Branch Facilities Plan.*

¹⁸⁶ LAPL website: <http://www.lapl.org/about-lapl/press/2012-library-facts>

¹⁸⁷ Written response from Thomas Jung, LAPL, July 30, 2014. Included in the Appendices.

*Source: Written response from Thomas Jung, LAPL, July 30, 2014. Included in the Appendices.
Table: CAJA Environmental Services, July 2014.*



15. RECREATION

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities.

The Project would generate approximately 475 residents and approximately 30 employees (net after the removal of the existing use). Employees of commercial and office developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The nearby parks and the open space provided on the Site are discussed under Section 14.iv. Parks, above. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of Recreation and Park Fees (identified as **Mitigation Measure 14-6**) will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of Recreation and Park Fees (identified as **Mitigation Measure 14-6**) will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

16. TRANSPORTATION AND TRAFFIC

This section is based on the following report and letter, included as Appendix F of this IS/MND:

- F-1** Traffic Impact Analysis for Mixed-Use Project, Overland Traffic Consultants, Inc., July 2014.
- F-2** LADOT Approval Letter, From Los Angeles Department of Transportation to Los Angeles Department of City Planning, August 22, 2014.
- a)** **Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

Less Than Significant Impact. A significant impact may occur if roadways and intersections that would carry project-generated traffic would exceed adopted City of Los Angeles Department of Transportation (LADOT) thresholds of significance.

Study Scope

The Traffic Impact Analysis has been conducted using the procedures adopted by the City of Los Angeles Department of Transportation (LADOT) to analyze the potential traffic impacts of new development projects. The 11 study intersections were evaluated using the LADOT Critical Movement Analysis (CMA) method. The CMA method calculates the operating conditions of each individual study intersection using a ratio of peak hour traffic volume to the intersection's capacity. Any change to the intersection's peak hour operating condition caused by an increase/decrease in traffic volume can be quantified (i.e. traffic impact) using this analysis method. Potential traffic impacts caused by a project that exceeds limits established by the City of Los Angeles as specified by LADOT are identified. Any potentially significantly impacted intersections are then evaluated for possible traffic mitigation measures. Pursuant to the City of Los Angeles traffic impact guidelines, the following steps have been taken to develop the existing and future traffic volume estimate:

- (a) New traffic counts were conducted on April 9, 2014 and May 21, 2014;
- (b) Traffic in (a) + the net Project traffic (existing + Project);
- (c) Traffic in (b) + proposed traffic mitigation, if necessary
- (d) Existing + ambient growth to 2018 (added additional 1% per year);
- (e) Traffic in (d) + related projects (future "without Project" scenario);
- (f) Traffic in (e) with the proposed Project traffic (future "with Project" scenario);

(g) Traffic in (f) + the proposed traffic mitigation, if necessary.

A CMA analysis of the existing and future traffic conditions has been completed at those locations expected to have the highest potential for significant traffic impacts. Morning and evening peak hour conditions have been evaluated at eleven (11) key intersections. Four of the intersections are under the jurisdiction of the City of West Hollywood and the remaining are under the jurisdiction of the City of Los Angeles. It should be noted that future traffic conditions include the potential construction of 54 other land development projects (related projects) in the general vicinity of the Project Site. Figure 3.16-1, Intersection Characteristic, illustrates the study locations, type of intersection traffic control and lane configurations for the Project impact analysis. The intersections analyzed in this study are:

1. Formosa Avenue and Santa Monica Boulevard (City of West Hollywood);
2. La Brea Avenue and Fountain Avenue (City of West Hollywood);
3. La Brea Avenue and Santa Monica Boulevard(City of West Hollywood);
4. La Brea Avenue and Romaine Street (City of West Hollywood);
5. La Brea Avenue and Willoughby Avenue (City of Los Angeles);
6. La Brea Avenue and Melrose Avenue (City of Los Angeles);
7. Orange Drive and Santa Monica Boulevard (City of Los Angeles);
8. Mansfield Avenue and Melrose Avenue (City of Los Angeles);
9. Highland Avenue and Santa Monica Boulevard (City of Los Angeles);
10. Highland Avenue and Willoughby Avenue (City of Los Angeles); and,
11. Highland Avenue and Melrose Avenue (City of Los Angeles).

Existing Transportation Facilities Setting

Hollywood Freeway is a regional north-south US-101 freeway is located to east of the Project. The Hollywood Freeway is accessible from the project area via Santa Monica Boulevard. The freeway is approximately 2.25 miles east of the Project Site. The Hollywood Freeway carries approximately 216,000 vehicles per day (VPD) with 12,800 vehicles per hour (VPH) during peak periods near Santa Monica Boulevard.

Santa Monica Freeway I-10 is an east-west freeway located south of the Project Site. The Santa Monica Freeway is accessible from the project area via La Brea Avenue. This freeway is located approximately 3.75 miles from the Project Site. The I-10 carries approximately 266,000 VPD with 17,900 vehicles per

hour during the peak periods. The US-101 and I-10 freeways link to numerous other freeways in the vicinity providing extensive regional access.

Formosa Avenue is a north-south roadway designated as a Local roadway according to the City of Los Angeles Transportation Element of the General Plan. This roadway provides one lane in each direction in the project vicinity. This roadway is part of the City of West Hollywood between Fountain Avenue and Romaine Street.

Fountain Avenue is an east-west roadway designated as a Secondary Highway in the City of Los Angeles Transportation Element of the General Plan east of La Brea Avenue. Fountain Avenue is under the jurisdiction of the City of West Hollywood west of La Brea Avenue in the project vicinity.

Highland Avenue is a north-south roadway designated as a Class II Major Highway in the City of Los Angeles Transportation Element of the General Plan. Three lanes in each direction are provided in the Project area during peak hours. Left turn lanes are provided at major intersections.

La Brea Avenue is a north-south roadway designated as a Class II Major Highway in the City of Los Angeles Transportation Element of the General Plan. Three lanes in each direction are provided in the Project area. La Brea Avenue is part of the City of West Hollywood between Fountain Avenue and Romaine Street.

Mansfield Avenue is a north-south roadway designated as a Local Street in the City of Los Angeles Circulation Map of the General Plan. One lane in each direction is provided in the project area.

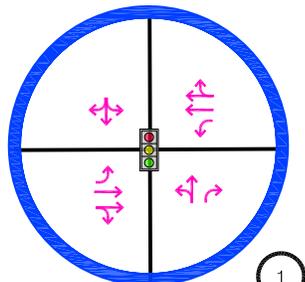
Melrose Avenue is an east-west roadway designated as a Secondary Highway in the City of Los Angeles Transportation Element of the General Plan. Two lanes in each direction are provided in the project area.

Orange Drive is a north-south roadway designated as a Collector Street north of Santa Monica Boulevard and as a Local Street south of Santa Monica Boulevard in the City of Los Angeles Transportation Element of the General Plan. One lane in each direction is provided in the project vicinity.

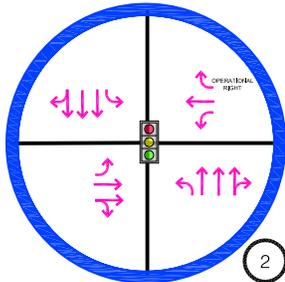
Romaine Street is an east-west roadway designated as a Local roadway according to the City of Los Angeles Circulation Map of the General Plan. The roadway provides one lane in each direction in the project vicinity. The roadway is the north/south border of the City of West Hollywood and City of Los Angeles between La Brea Avenue and Gardner Street.

Santa Monica Boulevard is an east-west roadway designated as a Class II Major Highway in the City of Los Angeles Transportation Element of the General Plan. Two lanes in each direction are provided in the Project area. Santa Monica Boulevard is identified as State Route 2 by the State of California Department of Transportation (Caltrans). The roadway is part of the City of West Hollywood between east of La Brea Avenue to Doheny Drive where the roadway jurisdiction changes to the City of Beverly Hills.

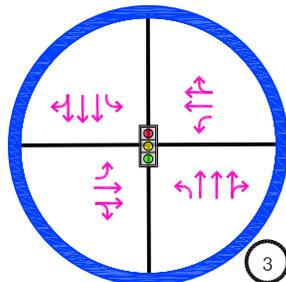
Willoughby Avenue is an east-west roadway designated as a Local roadway according to the City of Los Angeles Circulation Map of the General Plan. One lane in each direction is provided in the project area. The roadway is the north/south border of the City of West Hollywood and City of Los Angeles between Gardner Street and Hayworth Avenue.



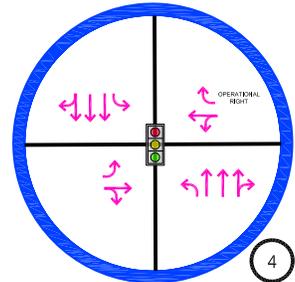
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FORMOSA AVENUE & SANTA MONICA BOULEVARD



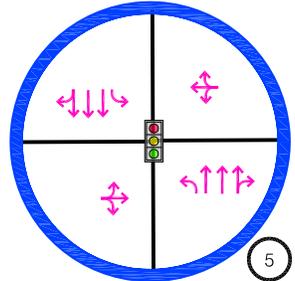
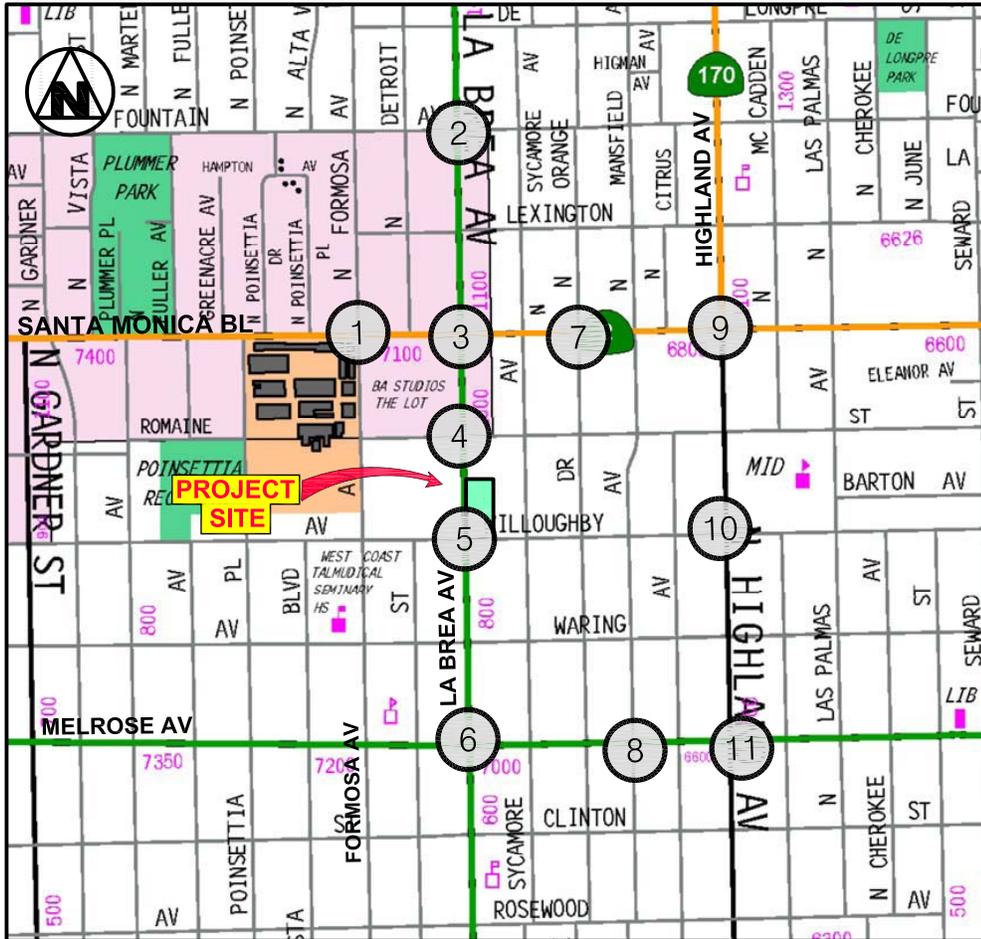
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LA BREA AVENUE & FOUNTAIN AVENUE



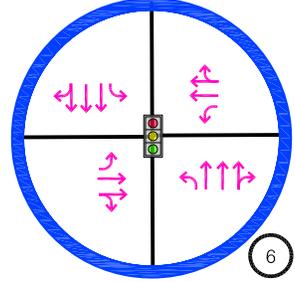
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LA BREA AVENUE & SANTA MONICA BOULEVARD



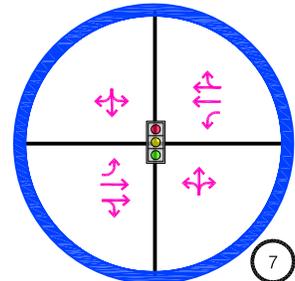
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LA BREA AVENUE & ROMAINE AVENUE



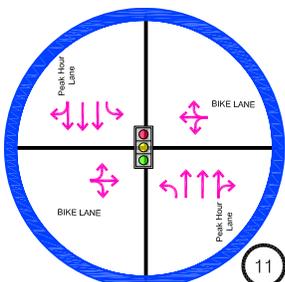
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LA BREA AVENUE & WILLOUGHBY AVENUE



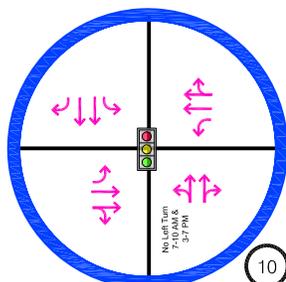
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LA BREA AVENUE & MELROSE AVENUE



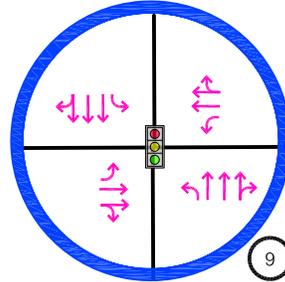
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ORANGE DRIVE & SANTA MONICA BOULEVARD



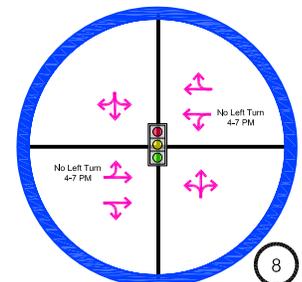
8
HIGHLAND AVENUE & MELROSE AVENUE



9
HIGHLAND AVENUE & WILLOUGHBY AVENUE



10
HIGHLAND AVENUE & SANTA MONICA BOULEVARD



11
MANSFIELD AVENUE & MELROSE AVENUE

Source: Overland Traffic Consultants, Inc., July 2014.

Project Traffic Generation

Traffic-generating characteristics of many land uses including the existing storage and proposed residential apartments and retail uses has been surveyed by the Institute of Transportation Engineers (ITE). The results of the traffic generation studies have been published in a handbook titled Trip Generation, 9th Edition. This publication of traffic generation data has become the industry standard for estimating traffic generation for different land uses. The ITE studies indicate that the use and the size associated with the proposed Project and existing uses generally exhibit the trip-making characteristics as shown by the trip rates in Table 3.16-1, Traffic Generation Rates.

**Table 3.16-1
Traffic Generation Rates**

ITE Code	Description	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
220	Apartment	6.65	0.51	20%	80%	0.62	65%	35%
820	Shopping Center (rates)	42.70	0.96	62%	38%	3.71	48%	52%
150	Warehousing	3.56	0.30	79%	21%	0.32	255	75%

*Rates for shopping center and warehouse are per 1,000 sf and Housing is per unit.
Table 1 in Traffic Impact Study, Overland Traffic Consultants, July 2014.
Table: CAJA Environmental Services, July 2014.*

The ITE rates are general in application and are established without regard for the nature of a specific project’s vicinity in terms of transit and walking or interaction with the traffic on the surrounding roadways. Considering the multiple transit opportunities, walkability and expanding cycling infrastructure in the City and the Project Site’s vicinity, it is anticipated that employees and patrons of the retail shopping center and apartment residents will make use of these options instead of single occupant vehicles. The project is within one quarter mile of the Metro Rapid Stop at La Brea Avenue and Santa Monica Boulevard. A transit trip reduction was estimated as 15% for the proposed uses as permitted by LADOT in their Traffic Study Guidelines. As approved by LADOT, the internal trip reduction (employees and visitors patronizing the shopping center) for the ground floor shopping center was conservatively estimated at 10%.

Many land uses are visited on the way to or from another main destination point. The greater the regional draw the lower the pass-by activities. LADOT has established pass-by credits for several land uses and are published in their June 2013 Traffic Study Policies and Procedures. The pass-by rates were developed from references in the ITE Recommended Practices, March 2001. The larger and renowned venues are most likely to be main destination points. The LADOT policy for a large shopping center (600,000 square feet or more) is a pass-by reduction of 10%. A small shopping center of 50,000 square feet or less is permitted a 50% pass-by reduction. Although permitted to use the 50% pass-by rate for the retail shopping center for this project, a more conservative pass-by reduction of 10% of the shopping center

trips was used in this analysis. This reduction is not taken at the adjacent intersections of La Brea Avenue and Willoughby Avenue because the drivers may need to make turning movements at the intersection to access the site’s parking. Table 3.16-2, Estimated Project Traffic Generation, displays the estimated Project trip generation. It is estimated that the Project will conservatively generate a net increase of 2,072 daily trips with 93 trips during the AM peak hour and 186 trips during the PM peak hour after credits for the existing storage, internal trips, transit/walk trips and pass-by trips.

**Table 3.16-2
Estimated Project Traffic Generation**

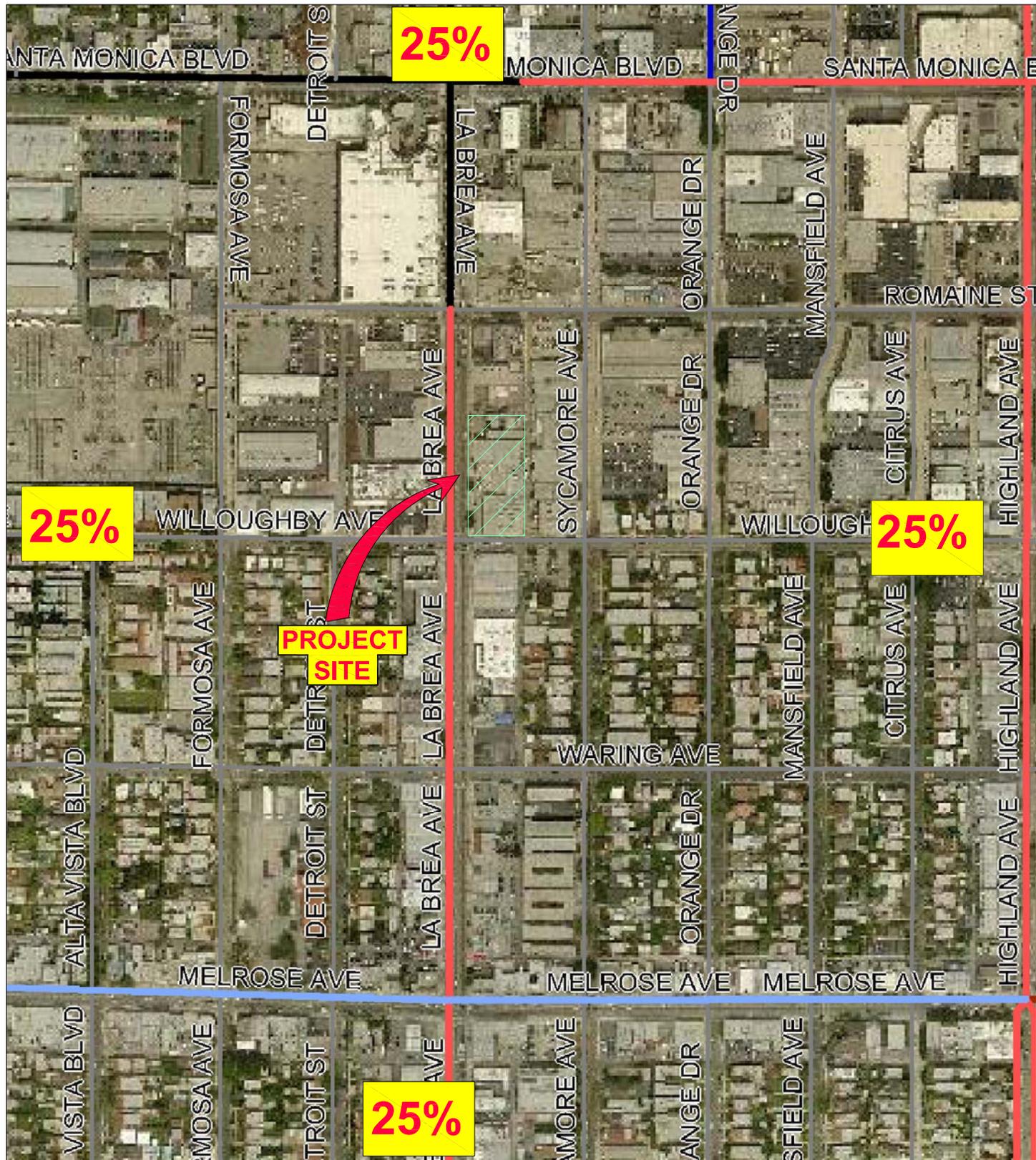
Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Proposed Project								
Retail	40,000 sf	1,708	38	24	14	148	71	77
-Internal Trips	10%	(171)	(4)	(3)	(1)	(15)	(7)	(8)
-Transit/Walk Trips*	15%	(231)	(5)	(3)	(2)	(20)	(10)	(10)
-Pass-By	10%	(131)	(3)	(2)	(1)	(11)	(5)	(6)
Subtotal		1,175	26	16	10	102	49	53
Apartment	169 units	1,124	86	17	69	105	68	37
-Transit/Walk Trips*	15%	(169)	(13)	(3)	(10)	(16)	(10)	(6)
Subtotal		955	73	14	59	89	58	31
Proposed Total		2,130	98	29	69	191	107	84
Existing Uses								
Storage	16,255 sf	58	5	4	1	5	1	4
Net New Project Total		2,072	93	25	68	186	106	80
*Project is within ¼ mile of Metro Rapid Line 704 at La Brea Avenue and Santa Monica Boulevard. Table 2 in <i>Traffic Impact Study</i> , Overland Traffic Consultants, July 2014. Table: CAJA Environmental Services, July 2014.								

Trip Distribution and Assignment of Project Traffic

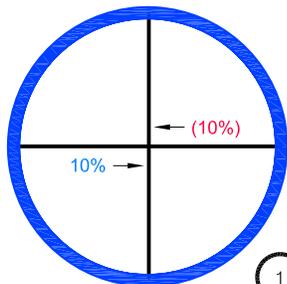
A primary factor affecting a Project’s trip direction is the spatial distribution destination points which would generate Project trip origins and destinations. The estimated Project directional trip distribution is also based on the study area roadway network, freeway locations, traffic flow patterns in and out of this area of the City of Los Angeles and consistency with previously approved traffic studies for this area of Los Angeles. The proposed project site is located along La Brea Avenue which is a major north-south roadway. It is also in close proximity is the east-west major roadways of Santa Monica Boulevard and Melrose Avenue. These facilities provide good access to/from the Project area. In addition, the Hollywood Freeway is to the north and east of the project site, the Santa Monica Freeway is to the south and the San Diego Freeway is to the west. These freeways provide good regional access to and from potential destination points. The City of West Hollywood is immediately west of the Project Site with Century City and West Los Angeles further west, the Hollywood Freeway provides access to Universal

Center, the San Fernando Valley and downtown Los Angeles. The Santa Monica Freeway provides access to downtown Los Angeles, West Los Angeles and Santa Monica.

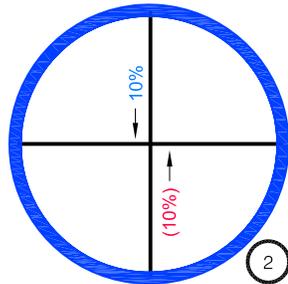
Figure 3.16-2 illustrates the estimated area wide Project traffic distribution percentages. Figures 3.16-3 and 3.16-4 shows the estimated Project traffic percentages detailed at each of the selected study intersections for residential and commercial components, respectively. Using the traffic assignment at each intersection and the estimated peak hour traffic volume as provided in the Table 3.16-2, peak hour traffic volumes at each study location have been calculated and are shown in Figure 3.16-5. This estimated assignment of the Project traffic flow provides the information necessary to analyze the potential traffic impacts generated by the Project at the study intersections.



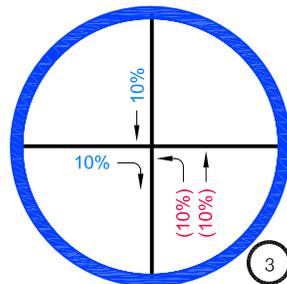
Source: Overland Traffic Consultants, Inc., July 2014.



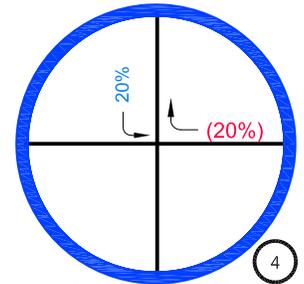
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FORMOSA AVENUE & SANTA MONICA BOULEVARD



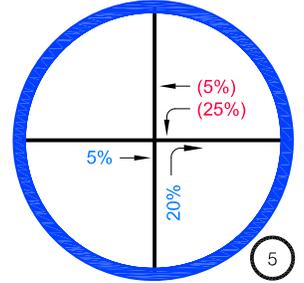
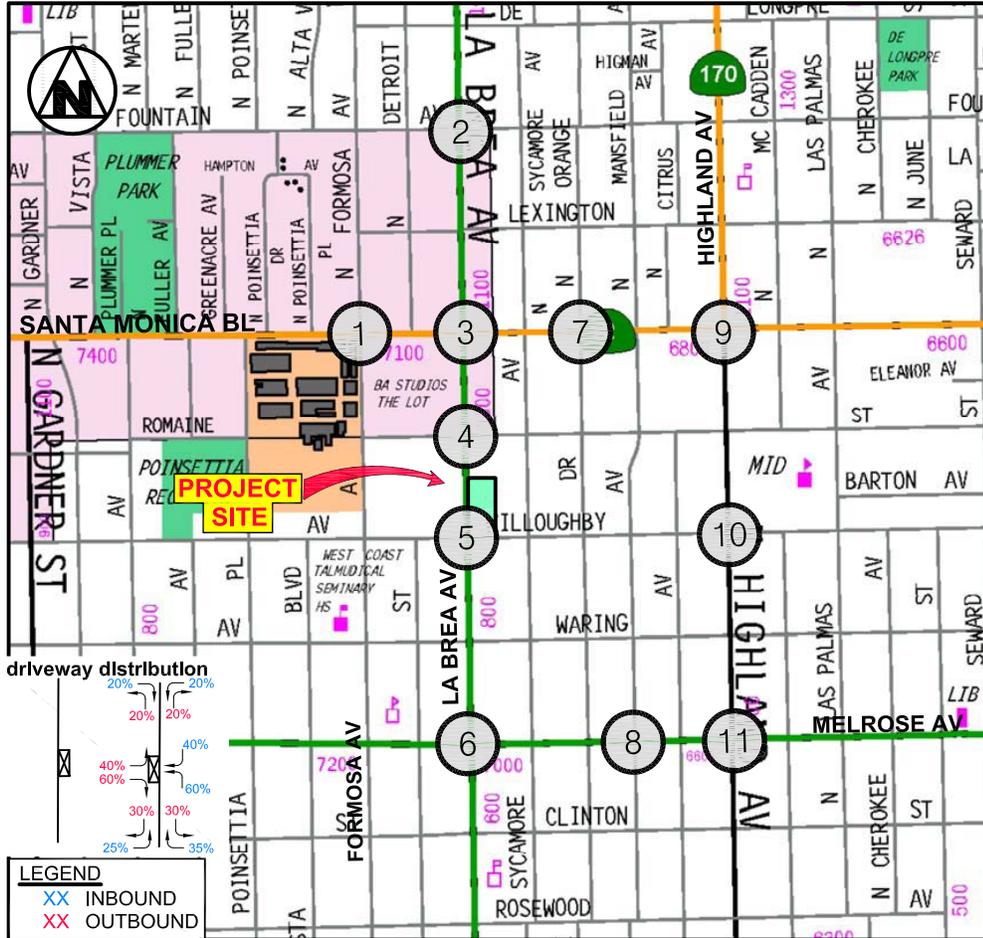
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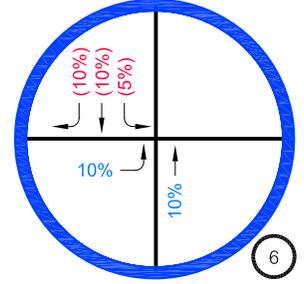
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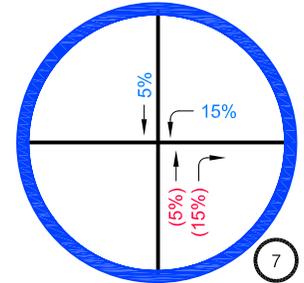
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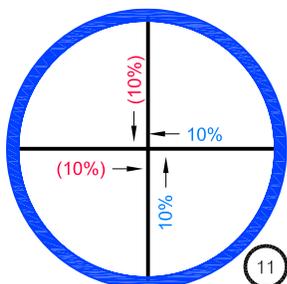
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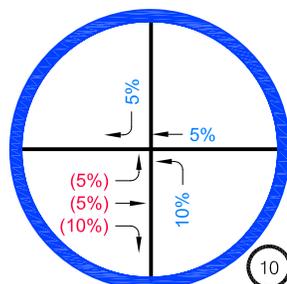
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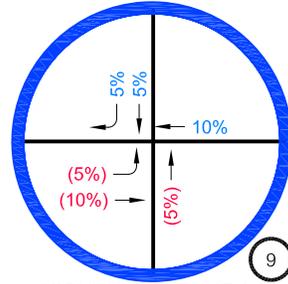
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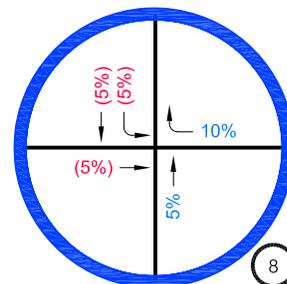
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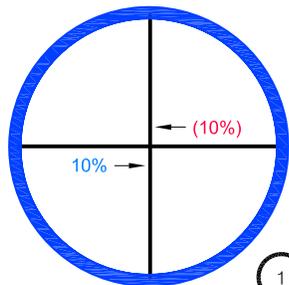


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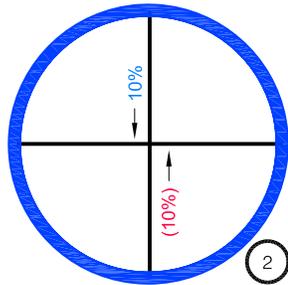


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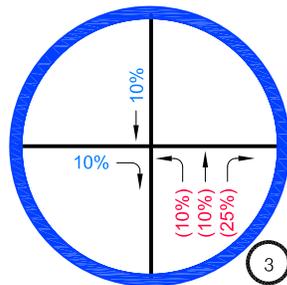
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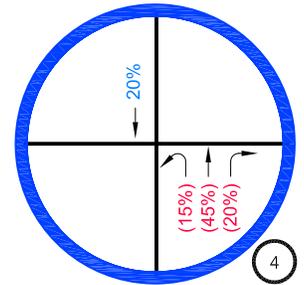
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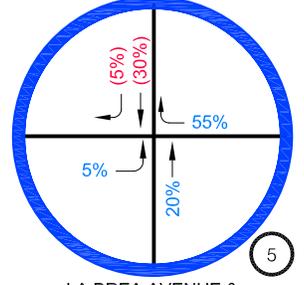
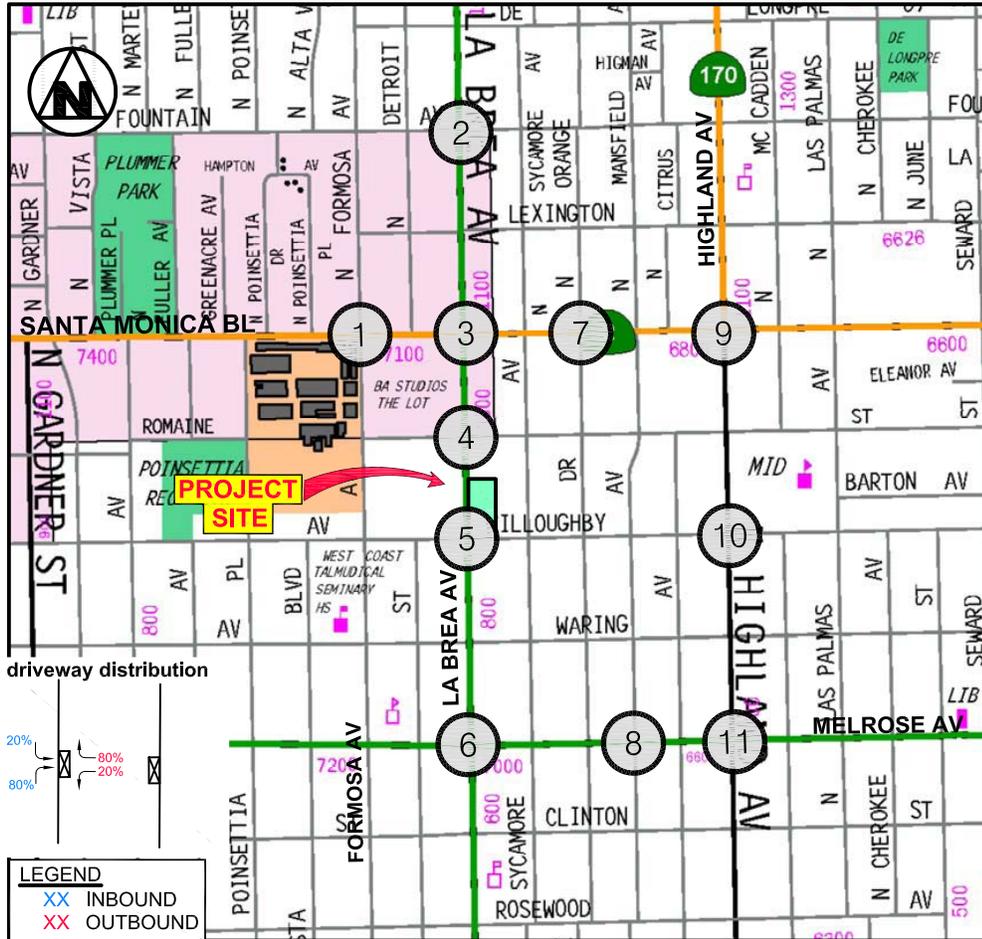
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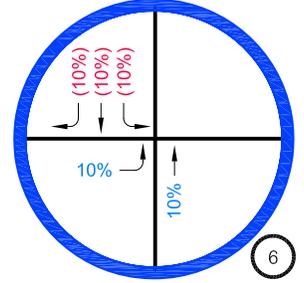
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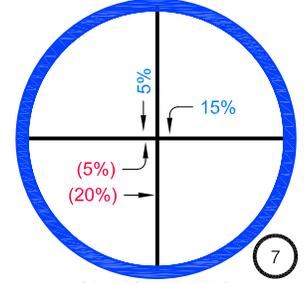
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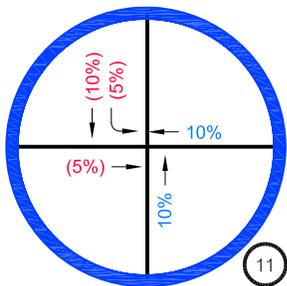
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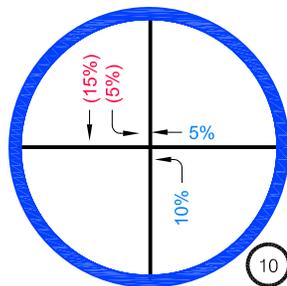
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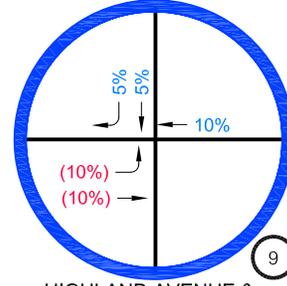
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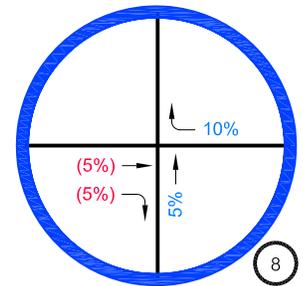
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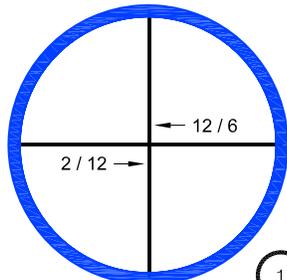


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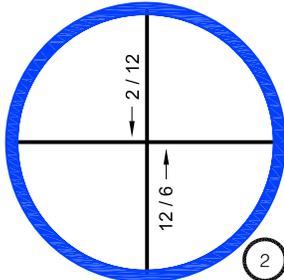


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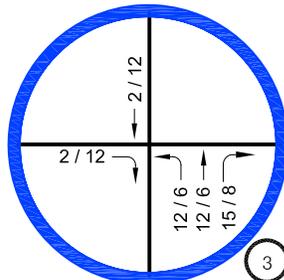
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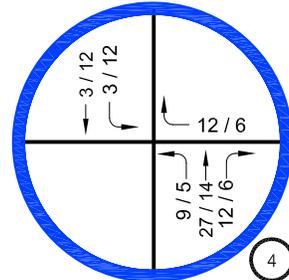
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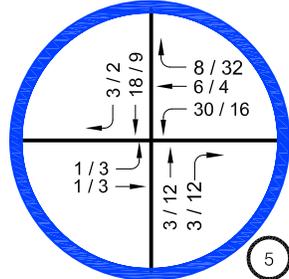
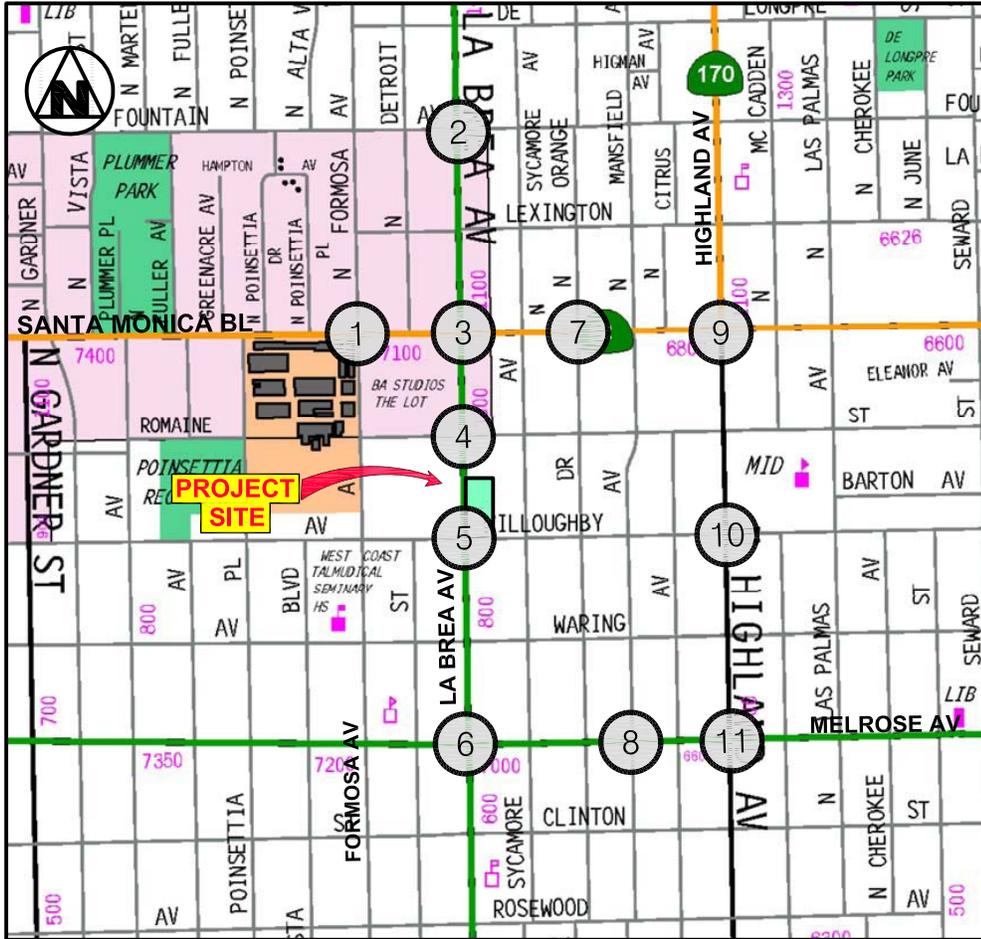
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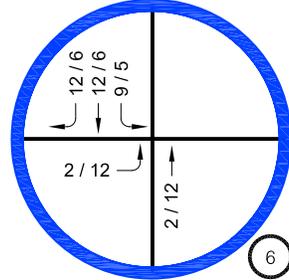
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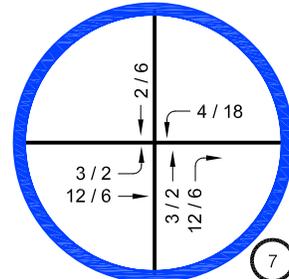
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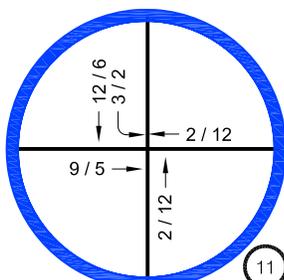
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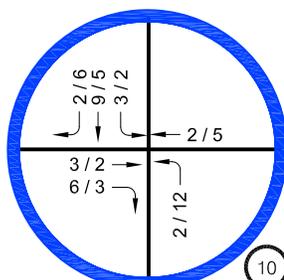
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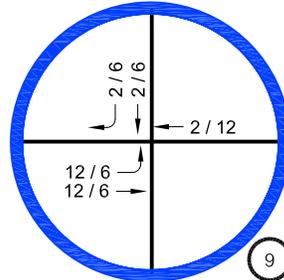
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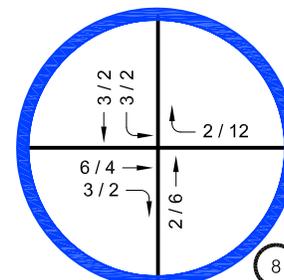
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HIGHLAND AVENUE & WILLOUGHBY AVENUE



HIGHLAND AVENUE & SANTA MONICA BOULEVARD



MANSFIELD AVENUE & MELROSE AVENUE

Source: Overland Traffic Consultants, Inc., July 2014.

Analysis of Existing Traffic Conditions

Traffic volume data used in the following peak hour intersectional analysis were based on traffic counts conducted by National Data Systems, an independent traffic data collection company. Traffic counts were conducted on April 9, 2014 and May 21, 2014. These were typical weekdays when there were no holidays, no rain and schools were in session. Traffic counts were conducted during the morning peak and evening peak hours. The highest single hour during each of the peak periods was used in this analysis. Existing traffic counts are provided in Figures 3.16-6 and 3.16-7 for the AM and PM peak hours respectively.

The traffic conditions analysis was conducted using the Critical Movement Analysis (CMA) method. The study intersections were evaluated using this methodology pursuant to the criteria established by the City of Los Angeles Department of Transportation for signalized intersections. The existing peak hour traffic counts were used along with intersection lane configurations and traffic controls to determine an intersection's current operating condition. The CMA procedure uses a ratio of an intersection's traffic volume to its capacity for rating an intersection's congestion level. The highest combinations of conflicting traffic volume (V) at an intersection are divided by the intersection capacity value. Intersection capacity (C) represents the maximum volume of vehicles that have a reasonable expectation of passing through an intersection in one hour under typical traffic flow conditions.

The CMA procedure uses a ratio of the traffic volume to the capacity of an intersection. This volume-to-capacity (V/C) ratio defines the proportion of an hour necessary to accommodate all the traffic moving through the intersection assuming full capacity. V/C ratios provide an ideal means for quantifying intersection operating characteristics. For example, if an intersection has a V/C value of 0.70, the intersection is operating at 70% capacity with 30% unused capacity. Once the volume-to-capacity ratio has been calculated, operating characteristics are assigned a level of service grade (A through F) to estimate the level of congestion and stability of the traffic flow. The term "Level of Service" (LOS) is used by traffic engineers to describe the quality of traffic flow. Definitions of the LOS grades are shown in Table 3.16-3, Level of Service Definitions.

Reductions for traffic signal improvements in the area are included in the analysis. The area currently has Automated Traffic Surveillance and Control (ATSAC) systems improvements which increase capacity at the intersection through computer aided signal progression. The City of Los Angeles has determined that this type of improvement increases capacity by approximately 7%. The City has supplemented the signal systems in the Hollywood area around the Project with an upgrade which includes advance loop detection at the intersections and system wide progression computer programming with system wide interaction between the traffic signals. This system is known as the Adaptive Traffic Control System (ATCS) system. An additional 3% capacity increase is estimated with this signal system. According to LADOT, the Hollywood area has been improved with these signal improvements. The existing and future traffic conditions analysis with and without the Project include ATSAC and ATCS at the study intersections within the City of Los Angeles only (not those in the City of West Hollywood). The intersection of La Brea Avenue and Santa Monica Boulevard had high pedestrian volumes during peak hours. The

intersection capacity was reduced from 1375 to 1200 vehicles per hour as done in similar studies in the City of Los Angeles to account for the high pedestrian volumes at the intersection.

**Table 3.16-3
Level of Service Definitions**

LOS	V/C Ratio	Operating Conditions
A	0.00 - 0.60	At LOS A, there are no cycles that are fully loaded, and few are even close to loaded. No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turning movements are easily made, and nearly all drivers find freedom of operation.
B	> 0.60 – 0.70	LOS B represents stable operation. An occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel somewhat restricted with platoons of vehicles.
C	> 0.70 – 0.80	In LOS C stable operation continues. Full signal cycle loading is still intermittent, but more frequent. Occasionally drivers may have to wait through more than one red signal indication, and back-ups may develop behind turning vehicles.
D	> 0.80 – 0.90	LOS D encompasses a zone of increasing restriction, approaching instability. Delays to approaching vehicles may be substantial during short peaks within the peak period, but enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive back-ups.
E	> 0.90 – 1.00	LOS E represents the most vehicles that any particular intersection approach can accommodate. At capacity (V/C = 1.00) there may be long queues of vehicles waiting upstream of the intersection and delays may be great (up to several signal cycles).
F	> 1.00	LOS F represents jammed conditions. Back-ups from location downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration; hence, volumes carried are not predictable. V/C values are highly variable, because full utilization of the approach may be prevented by outside conditions.

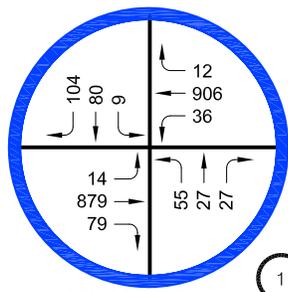
*Source: Table 4, Traffic Impact Study, Overland Traffic, July 2014.
Table by CAJA Environmental Services, July 2014.*

By applying the CMA procedures to the intersection data, the V/C values and the corresponding Levels of Service (LOS) for existing traffic conditions were determined at the study intersections. The LOS values for the intersections are summarized in Table 3.16-4.

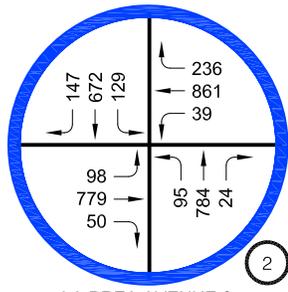
**Table 3.16-4
Level of Service for Existing Conditions**

No.	Intersection	Peak Hour	Existing	
			CMA	LOS
1	Formosa Avenue and Santa Monica Boulevard	AM	0.509	A
		PM	0.657	B
2	La Brea Avenue and Fountain Avenue	AM	0.719	C
		PM	0.754	C
3	La Brea Avenue and Santa Monica Boulevard	AM	0.645	B
		PM	0.819	D
4	La Brea Avenue and Romaine Street	AM	0.513	A
		PM	0.640	B
5	La Brea Avenue and Willoughby Avenue	AM	0.493	A
		PM	0.553	A
6	La Brea Avenue and Melrose Avenue	AM	0.786	C
		PM	0.797	C
7	Orange Drive and Santa Monica Boulevard	AM	0.407	A
		PM	0.539	A
8	Mansfield Avenue and Melrose Avenue	AM	0.481	A
		PM	0.424	A
9	Highland Avenue and Santa Monica Boulevard	AM	0.789	C
		PM	0.925	E
10	Highland Avenue and Willoughby Avenue	AM	0.554	A
		PM	0.598	A
11	Highland Avenue and Melrose Avenue	AM	0.989	E
		PM	0/981	E

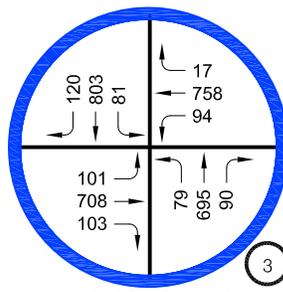
*Intersections 1, 2, 3, and 4 are under the jurisdiction of the City of West Hollywood.
Source: Table 5, Traffic Impact Study, Overland Traffic, July 2014.
Table by CAJA Environmental Services, July 2014.*



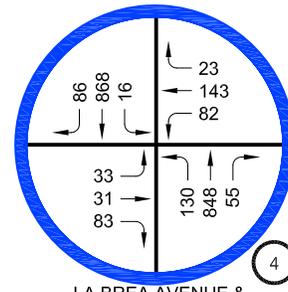
FORMOSA AVENUE & SANTA MONICA BOULEVARD



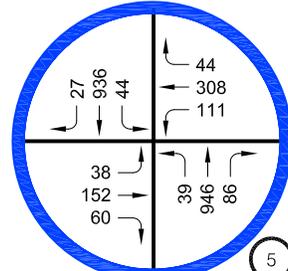
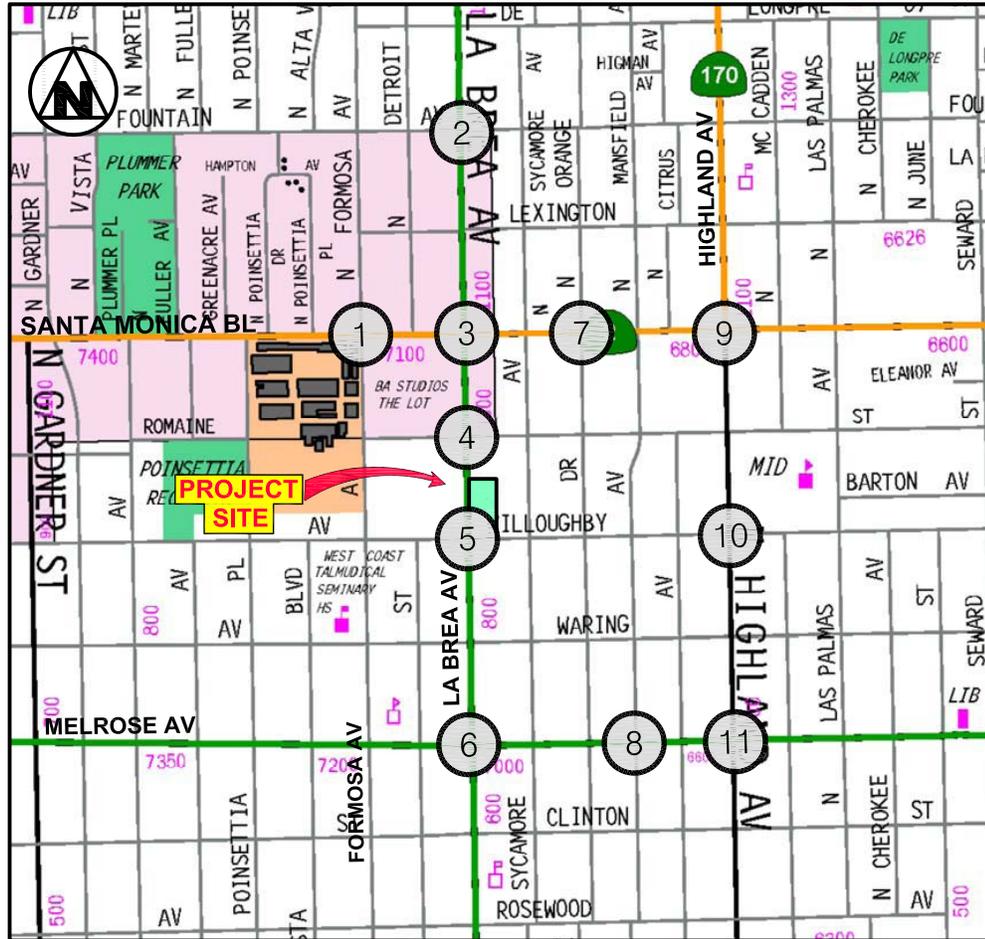
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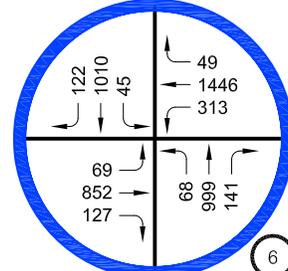
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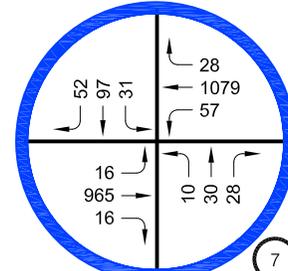
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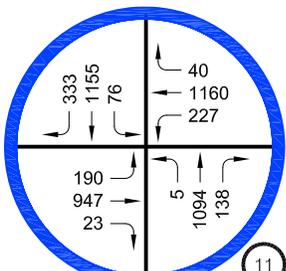
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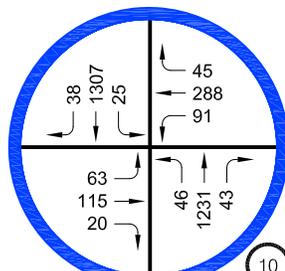
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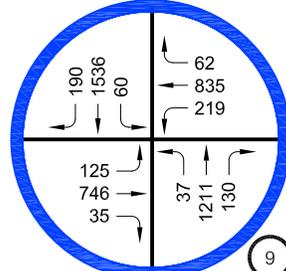
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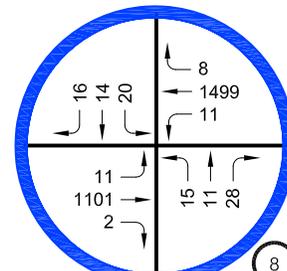
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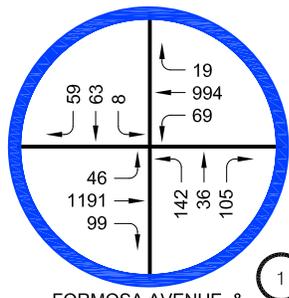


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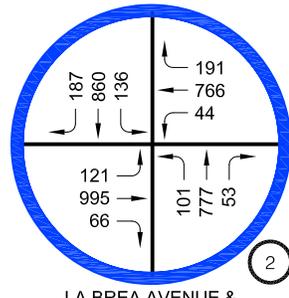


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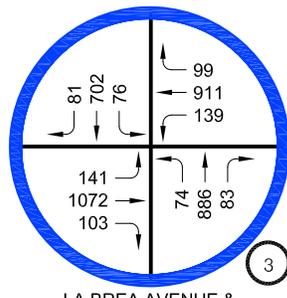
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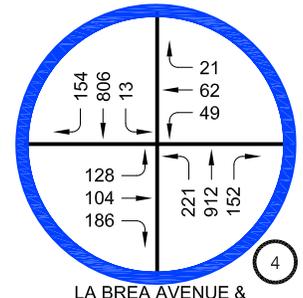
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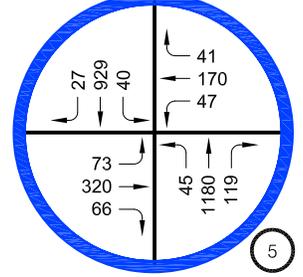
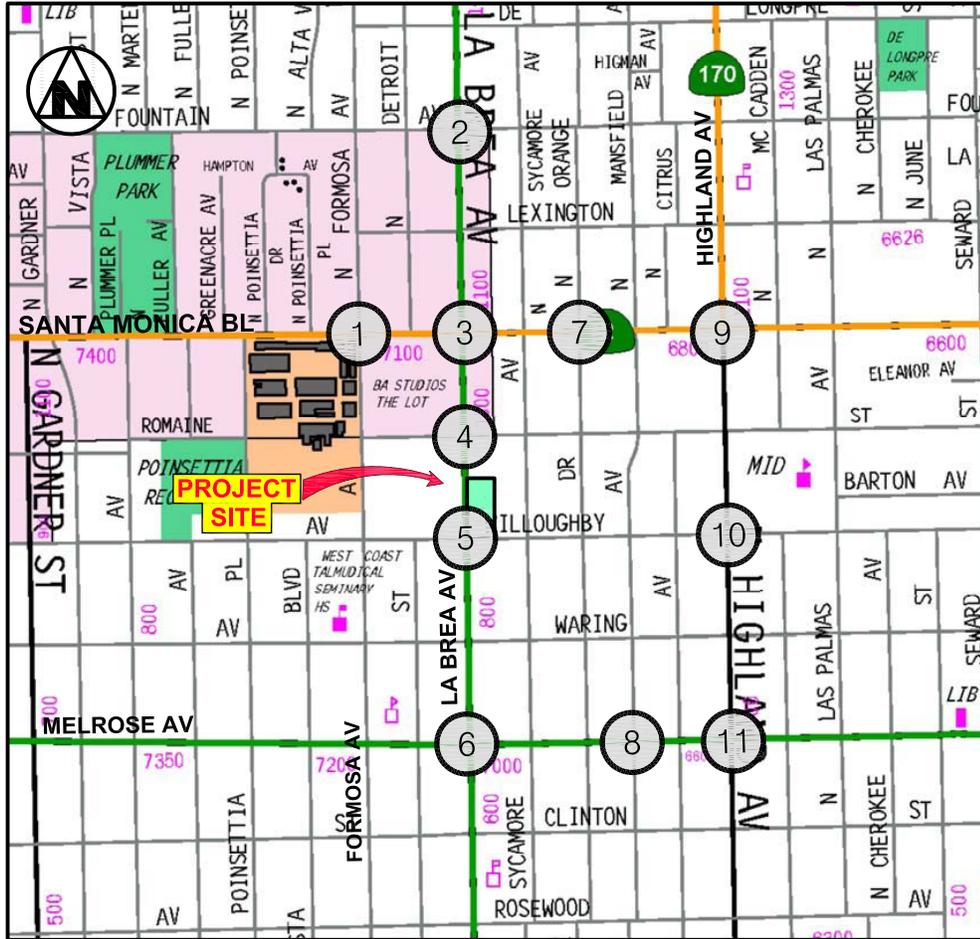
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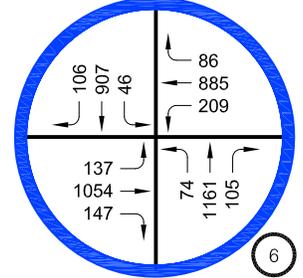
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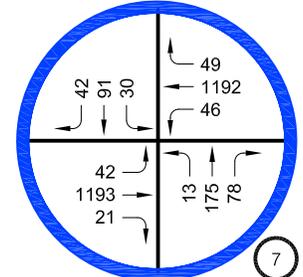
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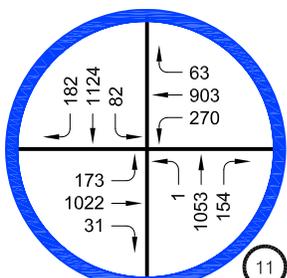
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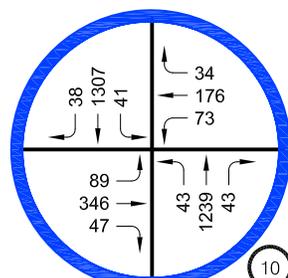
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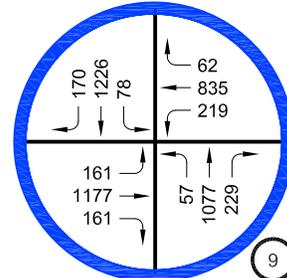
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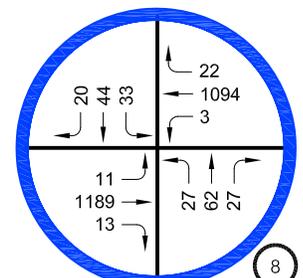
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HIGHLAND AVENUE & SANTA MONICA BOULEVARD



MANSFIELD AVENUE & MELROSE AVENUE

Source: Overland Traffic Consultants, Inc., July 2014.

Analysis of Existing + Project Conditions

An evaluation has been conducted to evaluate potential Project impacts to the existing conditions. According to the standards adopted by LADOT and described in their June 2013 Traffic Study Policies and Procedures, a traffic impact is considered significant if the related increase in the V/C value equals or exceeds the thresholds shown in the Table 3.16-5 for the City of Los Angeles and Table 3.16-6 for the City of West Hollywood. No significant impacts occur at LOS A or B because intersections operations are good and can accommodate additional traffic growth.

**Table 3.16-5
Significant Impact Criteria, City of Los Angeles**

LOS	Final V/C Value	Increase in V/C Value
C	0.701 – 0.800	+ 0.040
D	0.801 – 0.900	+ 0.020
E and F	> 0.901	+ 0.010 or more

*Source: Table 6a, Traffic Impact Study, Overland Traffic, July 2014.
Table by CAJA Environmental Services, July 2014.*

**Table 3.16-6
Significant Impact Criteria, City of West Hollywood**

LOS	Final V/C Value	Increase in V/C Value
E and F	> 0.901	+ 0.020 or more

*Source: Table 6b, Traffic Impact Study, Overland Traffic, July 2014.
Table by CAJA Environmental Services, July 2014.*

The potential impact for existing plus Project was conducted by adding the Project traffic to the existing traffic. The existing and existing + Project traffic conditions were compared to determine if the thresholds of significance in Tables 3.16-5 and 3.16-6 were exceeded. As noted in Table 3.16-7, no significant impacts occur when the Project’s traffic generation is added to the existing conditions.

**Table 3.16-7
Traffic Conditions for Existing + Project**

No.	Intersection	Peak Hour	Existing		Existing + Project			Significant Impact
			CMA	LOS	CMA	LOS	Impact	
1	Formosa Avenue and Santa Monica Boulevard	AM	0.509	A	0.509	A	+ 0.000	No
		PM	0.657	B	0.661	B	+ 0.004	No
2	La Brea Avenue and Fountain Avenue	AM	0.719	C	0.719	C	+ 0.000	No
		PM	0.754	C	0.758	C	+ 0.004	No
3	La Brea Avenue and Santa Monica Boulevard	AM	0.645	B	0.655	B	+ 0.010	No
		PM	0.819	D	0.827	D	+ 0.008	No
4	La Brea Avenue and Romaine Street	AM	0.513	A	0.521	A	+ 0.008	No
		PM	0.640	B	0.647	B	+ 0.007	No
5	La Brea Avenue and Willoughby Avenue	AM	0.493	A	0.524	A	+ 0.031	No
		PM	0.553	A	0.573	A	+ 0.020	No
6	La Brea Avenue and Melrose Avenue	AM	0.786	C	0.793	C	+ 0.007	No
		PM	0.797	C	0.803	D	+ 0.006	No
7	Orange Drive and Santa Monica Boulevard	AM	0.407	A	0.410	A	+ 0.003	No
		PM	0.539	A	0.552	A	+ 0.013	No
8	Mansfield Avenue and Melrose Avenue	AM	0.481	A	0.485	A	+ 0.004	No
		PM	0.424	A	0.431	A	+ 0.007	No
9	Highland Avenue and Santa Monica Boulevard	AM	0.789	C	0.795	C	+ 0.006	No
		PM	0.925	E	0.931	E	+ 0.006	No
10	Highland Avenue and Willoughby Avenue	AM	0.554	A	0.559	A	+ 0.005	No
		PM	0.598	A	0.611	B	+ 0.014	No
11	Highland Avenue and Melrose Avenue	AM	0.989	E	0.992	E	+ 0.003	No
		PM	0/981	E	0.998	E	+ 0.007	No

*Intersections 1, 2, 3, and 4 are under the jurisdiction of the City of West Hollywood.
Source: Table 7, Traffic Impact Study, Overland Traffic, July 2014.
Table by CAJA Environmental Services, July 2014.*

Analysis of Future Traffic Conditions

Future traffic volume projections have been developed to analyze the traffic conditions after completion of other planned land developments including the Project. Pursuant to the City of Los Angeles traffic impact guidelines, the following steps have been taken to develop the future traffic volume estimate:

- (a) Existing traffic 2014 conditions;
- (b) Traffic in (a) + ambient growth (1 % per year increase to the operational year 2018)
- (c) Traffic in (b) + related projects (without Project scenario);

(d) Traffic in (c) with the proposed Project traffic (with Project scenario);

(e) Traffic in (d) + the proposed traffic mitigation, if necessary.

The future cumulative analysis includes other reasonably foreseeable development projects located within the study area that are either under construction or brought to the attention of the City as planned for future development. As part of this analysis, the related project information was obtained from the City of Los Angeles Department of Transportation¹⁸⁸, City of Los Angeles Department of City Planning, and City of West Hollywood. LADOT requires 1 mile radius for related projects. It should be noted that this Project or any actions taken by the City regarding this Project, does not have a direct bearing on the other proposed related projects. The locations of the related projects are shown in Figure 3.16-8 and described in Table 3.16-8. The number of trips added to the area by the related projects alone is displayed in Figure 3.16-9.

To evaluate future traffic conditions with the related project, estimates of the peak hour trips generated were developed. The potential traffic growth in the future at the study intersections has been determined by adding the existing traffic volume, ambient traffic growth of 1% per year and traffic from the other related development projects. Future cumulative “without project” peak hour traffic volume estimates are shown in Figure 3.16-10 for the AM Peak Hour and Figure 3.16-11 for the PM Peak Hour.

**Table 3.16-8
Related Projects Descriptions**

No.	Project	Size	Location
1	Television Center Health Club Expansion Warehouse to Studio Office	9,992 sf 3,120 sf	6311 Romaine Street
2	Daycare Kindergarten	60 students 120 students	7002 Clinton Street
3	Retail Apartments	18,159 sf 187 units	1222 La Brea Avenue
4	Hotel Restaurant Restaurant (to be removed)	80 rooms 15,920 sf (9,838 sf)	6381 Hollywood Boulevard
5	Office	130,000 sf	956 Seward Street
6	Apartments Retail	37 units 1,315 sf	1145 La Brea Avenue
7	Hollywood Center Studios		6601 Romaine Street

¹⁸⁸ Data obtained for related projects on March 6, 2014 and updated May 2014.

	Office Storage	104,155 sf 1,970 sf	
8	Theater Office (Pantages)	214,000 sf	6225 Hollywood Boulevard
9	Apartments	43 units	7045 Lanewood
10	Apartments Condominiums	21 units 36 units	1149 Gower
11	Apartments HTO Restaurant Office Fast food Restaurant Health Club Retail	200 units 23,500 sf 422,500 sf 2,000 sf 15,000 sf 16,500 sf	6121 Sunset Boulevard
12	Residential Retail Live-Work	1,042 units 175,000 sf 24 units	6200 Hollywood Boulevard
13	Retail Apartments	12,800 sf 184 units	7113 Santa Monica Boulevard
14	Apartments Retail	166 units 9,655 sf	7141 Santa Monica Boulevard
15	Apartments Market	179 units 33,500 sf	915 N. La Brea Avenue
16	Office	85,000 sf	6516-6526 Selma
17	Office	100,000 sf	1041 Formosa Avenue
18	Residential Retail	76 units 2,500 sf	1411 Highland Avenue
19	Office Retail	121,609 sf 2,613 sf	1601 Vine Street
20	Apartments Condominiums Retail	76 units 294 units 22,500 sf	7300 Santa Monica Boulevard
21	Apartments Restaurant Retail	786 units 5,500 sf 12,700 sf	6677 Santa Monica Boulevard
22	Hotel Lobby Bar Restaurant Pool Deck Bar/Lounge	180 rooms 990 sf 2,413 sf 6,000 sf	6417 W. Selma Avenue
23	Office Restaurant	4,074 sf 10,402 sf	6523 Hollywood Boulevard
24	Affordable Apartments	66 units	1603 Cherokee Avenue
25	Restaurant Special Events Bar/Lounge	11,400 sf 6,100 sf 9,400 sf	6608 Hollywood Boulevard

	Office	3,000 sf	
26	Apartments Retail	306 units 68,000 sf	1540 N. Vine Street
27	Hollywood Cherokee Apartments	225 units	1718-1730 Las Palmas 1719-1727 Cherokee
28	Millennium Hollywood Apartments Hotel Health Club Office Retail Restaurant	461 units 254 rooms 80,000 sf 264,303 sf 100,000 sf 2,500 sf	1740 N. Vine Street
29	Apartments Retail	248 units 14,710 sf	1610 N. Highland Avenue
30	New Hotel	118 rooms	1133 N. Vine Street
31	Apartments	118 units	1824 N. Highland Avenue
32	Hotel	100 rooms	1841 N. Highland Avenue
33	Office	240,000 sf	959 N. Seward Street
34	Apartments Restaurant	44 units 2,900 sf	7120 W. Sunset Boulevard
35	Tutoring Center	100 students	927 N. Highland Avenue
36	Apartments	100 units	712 N. Wilcox Avenue
37	Office Retail	88,750 sf 12,000 sf	936 N. La Brea Avenue
38	Temple Israel School	79 students	7300 Hollywood Boulevard
39	Hotel	296 rooms	8490 Sunset Boulevard
40	Hotel Condominium Apartments	149 rooms 40 units 5 units	8418 Sunset Boulevard
41	Paramount Studios Sound Stage Stage Support Production Office General Office Retail	21,000 sf 1,900 sf 635,500 sf 638,100 sf 64,200 sf	5555 W. Melrose Avenue
42	Condominium Senior Housing	150 units 150 units	6298 Hollywood Boulevard
43	Apartments Retail	71 units 11,454 sf	7901 W. Beverly Boulevard
44	Hotel Restaurant Banquet Rooms Restaurant	225 units 11,797 sf 9,504 sf 4,443 sf	1541 Wilcox

45	All Suites Hotel Ground Floor Commercial 2 nd Floor Restaurant	195 rooms 24,000 sf 4,200 sf	6611-6637 Hollywood Boulevard
46	Office Retail	169,463 sf 24,200 sf	1546 N. Argyle
47	Retail Apartments	111,000 sf 249 units	8150 Sunset Boulevard
48	Restaurant	806 sf	859 Highland Avenue
49	Retail Apartments	13,830 sf 25 units	8120 Santa Monica Boulevard
50	Apartments	27 units	8240 Sunset Boulevard
51	Retail	13,000 sf	8305 Santa Monica Boulevard
52	Apartments Retail	20 units 7,099 sf	8350 Santa Monica Boulevard
53	Residential Restaurant Retail Retail (to be removed)	238 units 10,000 sf 20,000 sf (38,060 sf)	7500-7580 Sunset
54	Office Shopping Center Trade School (to be removed)	53,000 sf 17,000 sf (20 students)	925 N. La Brea
<p><i>Source: Table 8, Traffic Impact Study, Overland Traffic, July 2014.</i> <i>Table by CAJA Environmental Services, July 2014.</i></p>			

The traffic conditions created by ambient traffic growth plus the other related development projects are shown below in Table 3.16-9 which demonstrates growth by comparing the existing traffic conditions and the future without Project conditions. Comparing the changes in the traffic conditions between the future without Project and future with Project provides the necessary information to determine if the Project's projected traffic increases have the potential to create a significant impact on any of the study intersections.

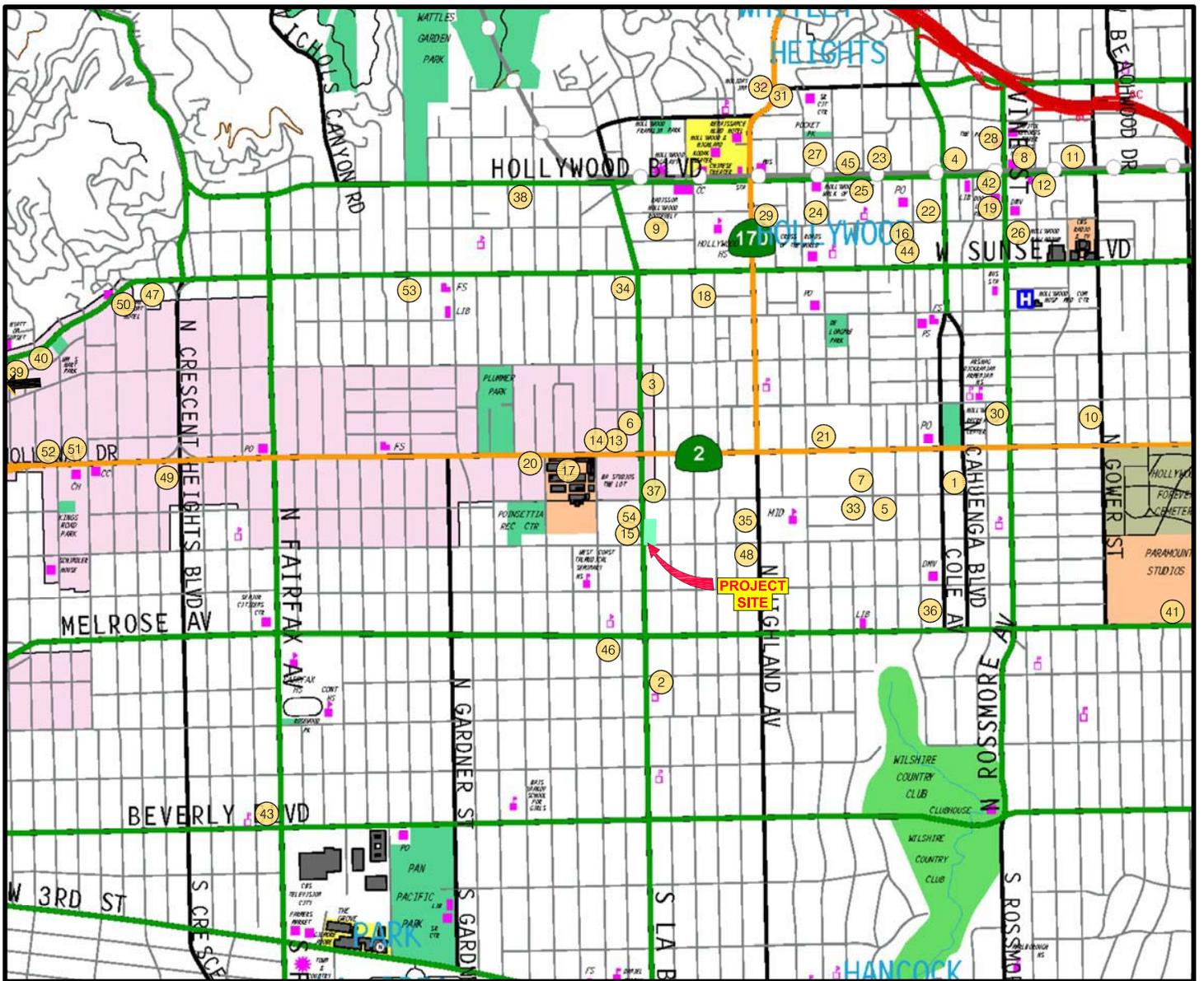
**Table 3.16-9
Future (2018) Traffic Conditions Without Project**

No.	Intersection	Peak Hour	Existing		Future (2018) Without Project		Growth
			CMA	LOS	CMA	LOS	
1	Formosa Avenue and Santa Monica Boulevard	AM	0.509	A	0.633	B	+ 0.124
		PM	0.657	B	0.785	C	+ 0.128
2	La Brea Avenue and Fountain Avenue	AM	0.719	C	0.793	C	+ 0.074
		PM	0.754	C	0.851	D	+ 0.097
3	La Brea Avenue and Santa Monica Boulevard	AM	0.645	B	0.844	D	+ 0.199
		PM	0.819	D	1.041	F	+ 0.222
4	La Brea Avenue and Romaine Street	AM	0.513	A	0.593	A	+ 0.080
		PM	0.640	B	0.743	C	+ 0.103
5	La Brea Avenue and Willoughby Avenue	AM	0.493	A	0.554	A	+ 0.061
		PM	0.553	A	0.653	B	+ 0.100
6	La Brea Avenue and Melrose Avenue	AM	0.786	C	0.897	D	+ 0.111
		PM	0.797	C	0.923	E	+ 0.126
7	Orange Drive and Santa Monica Boulevard	AM	0.407	A	0.499	A	+ 0.092
		PM	0.539	A	0.667	B	+ 0.128
8	Mansfield Avenue and Melrose Avenue	AM	0.481	A	0.538	A	+ 0.057
		PM	0.424	A	0.493	A	+ 0.069
9	Highland Avenue and Santa Monica Boulevard	AM	0.789	C	0.957	E	+ 0.168
		PM	0.925	E	1.088	F	+ 0.163
10	Highland Avenue and Willoughby Avenue	AM	0.554	A	0.647	B	+ 0.093
		PM	0.598	A	0.713	C	+ 0.116
11	Highland Avenue and Melrose Avenue	AM	0.989	E	1.129	F	+ 0.140
		PM	0.981	E	1.153	F	+ 0.172

Intersections 1, 2, 3, and 4 are under the jurisdiction of the City of West Hollywood.

Source: Table 9, Traffic Impact Study, Overland Traffic, July 2014.

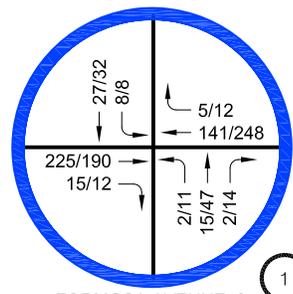
Table by CAJA Environmental Services, July 2014.



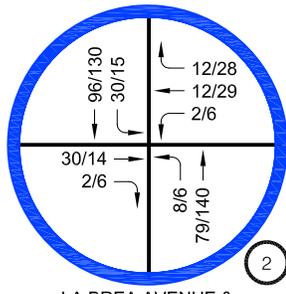
Source: Overland Traffic Consultants, Inc., July 2014.



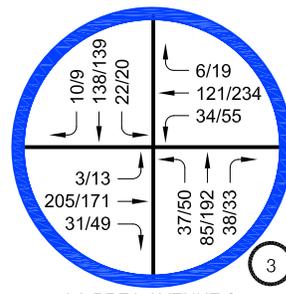
Not to Scale



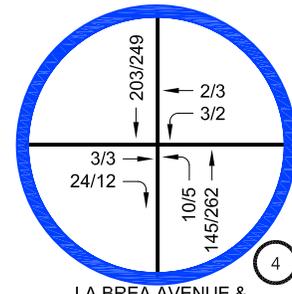
FORMOSA AVENUE & SANTA MONICA BOULEVARD



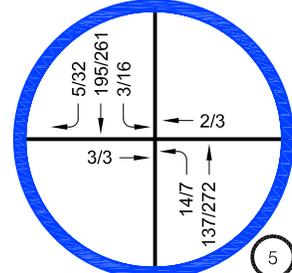
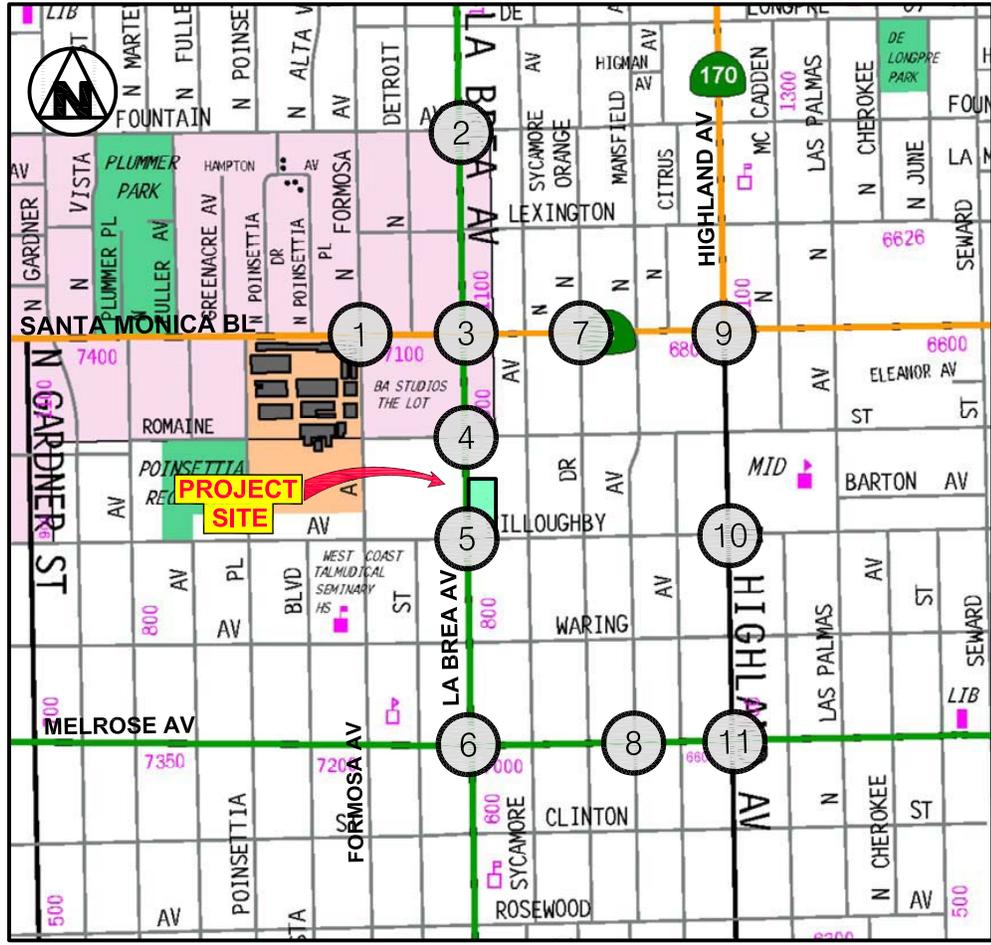
LA BREA AVENUE & FOUNTAIN AVENUE



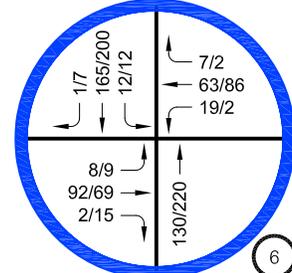
LA BREA AVENUE & SANTA MONICA BOULEVARD



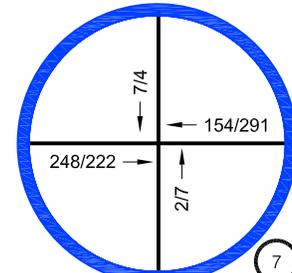
LA BREA AVENUE & ROMAINE AVENUE



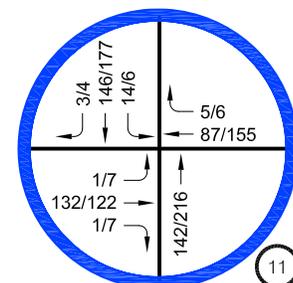
LA BREA AVENUE & WILLOUGHBY AVENUE



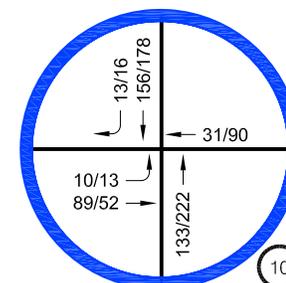
LA BREA AVENUE & MELROSE AVENUE



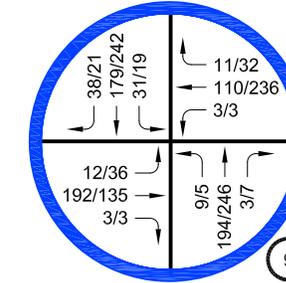
ORANGE DRIVE & SANTA MONICA BOULEVARD



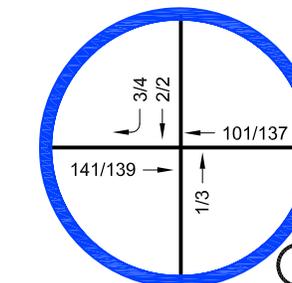
HIGHLAND AVENUE & MELROSE AVENUE



HIGHLAND AVENUE & WILLOUGHBY AVENUE

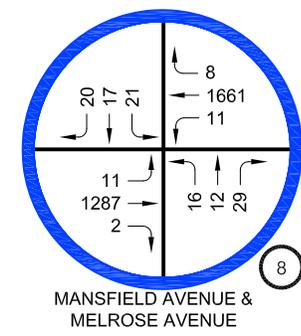
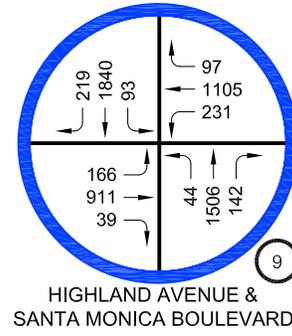
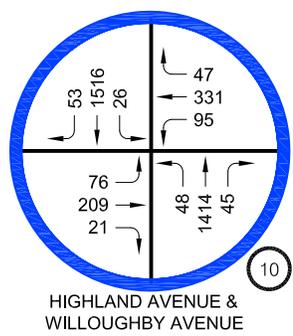
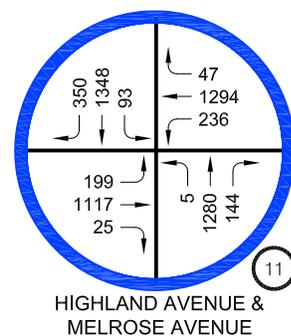
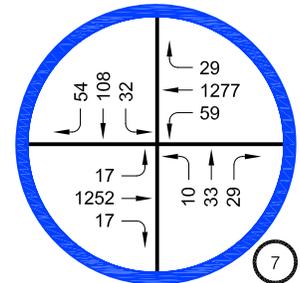
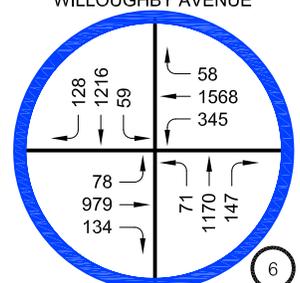
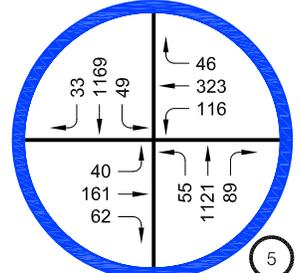
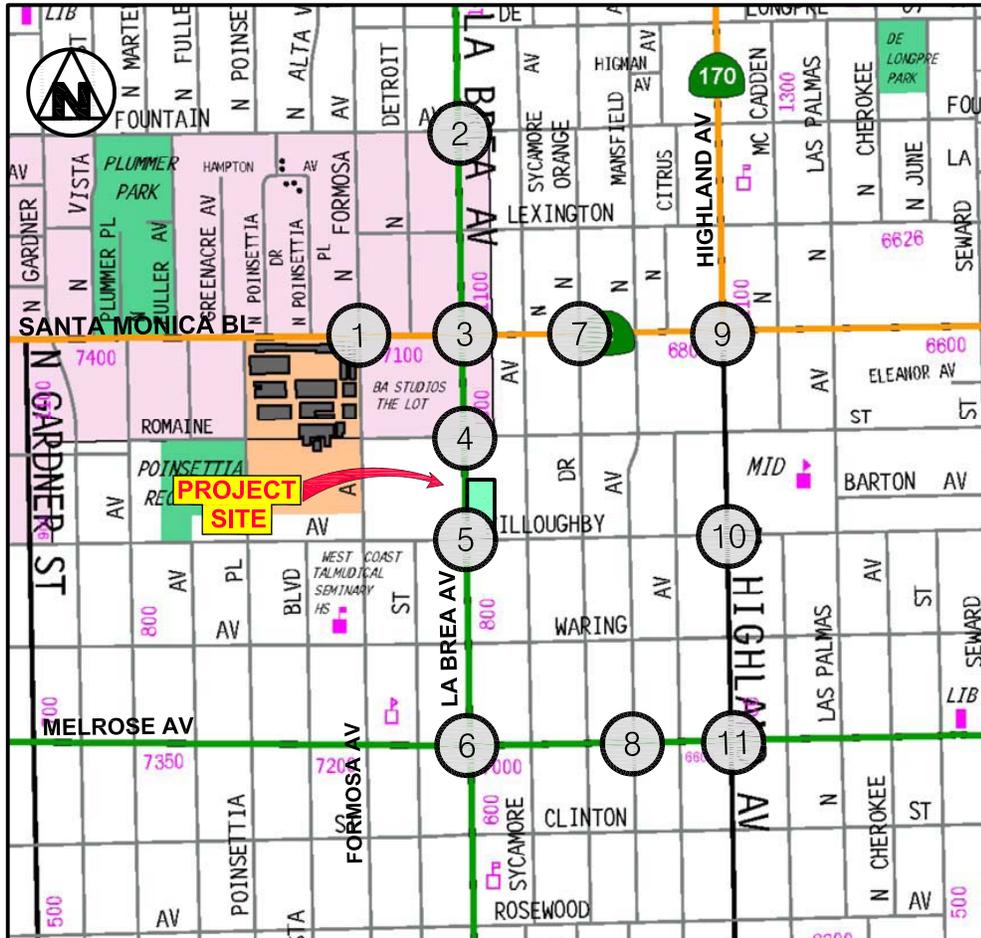
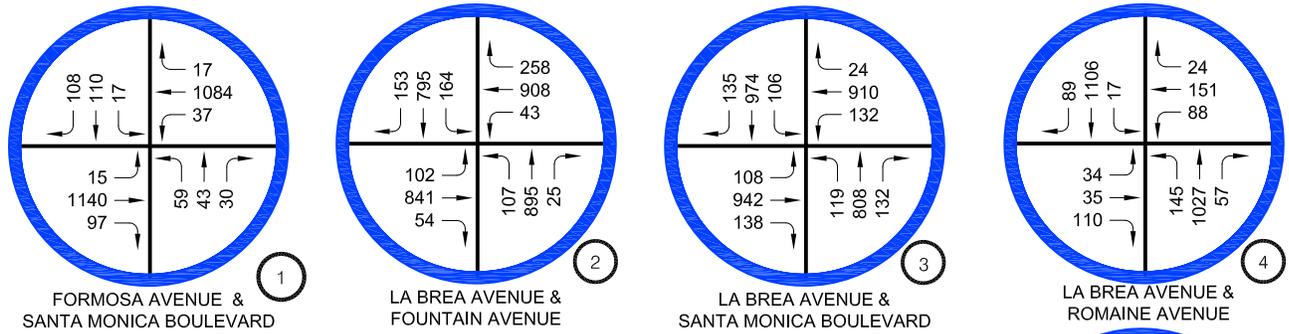


HIGHLAND AVENUE & SANTA MONICA BOULEVARD

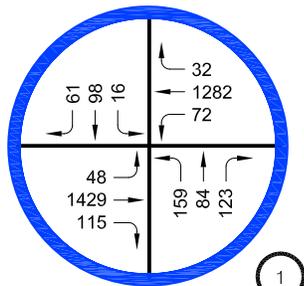


MANSFIELD AVENUE & MELROSE AVENUE

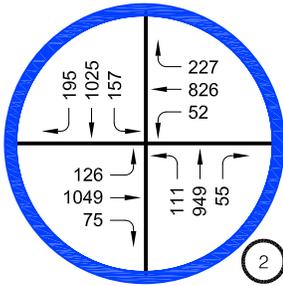
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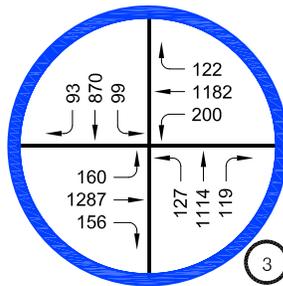
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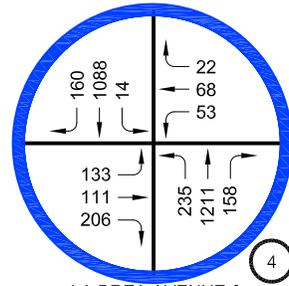
FORMOSA AVENUE & SANTA MONICA BOULEVARD



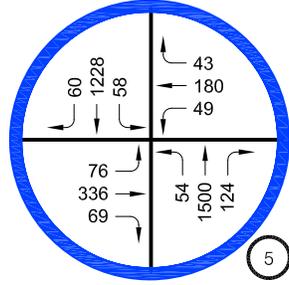
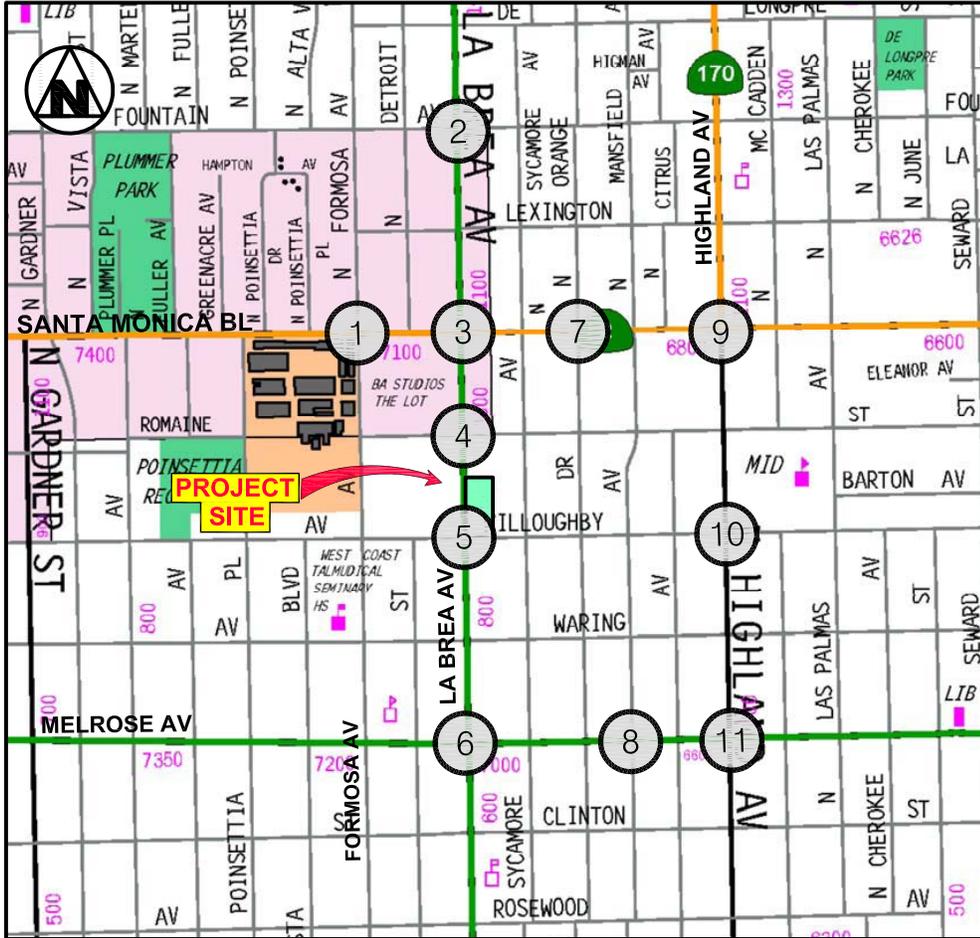
LA BREA AVENUE & FOUNTAIN AVENUE



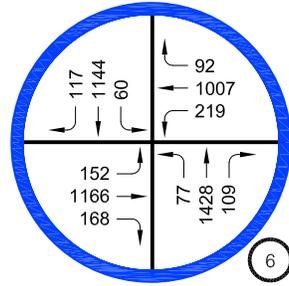
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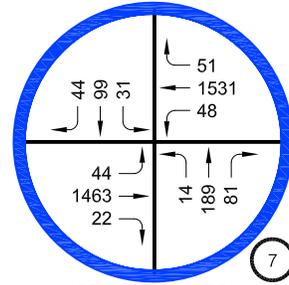
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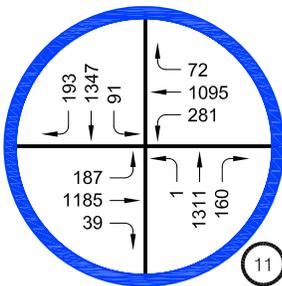
LA BREA AVENUE & WILLOUGHBY AVENUE



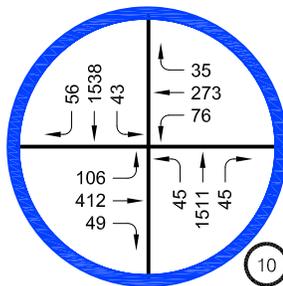
LA BREA AVENUE & MELROSE AVENUE



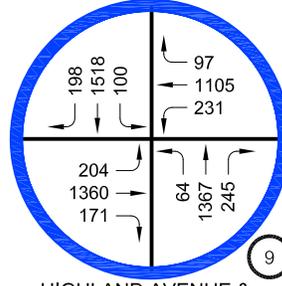
ORANGE DRIVE & SANTA MONICA BOULEVARD



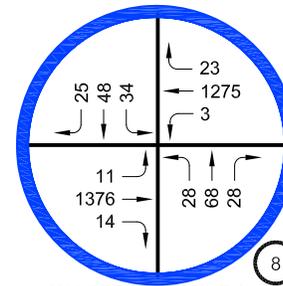
HIGHLAND AVENUE & MELROSE AVENUE



HIGHLAND AVENUE & WILLOUGHBY AVENUE



HIGHLAND AVENUE & SANTA MONICA BOULEVARD



MANSFIELD AVENUE & MELROSE AVENUE

Source: Overland Traffic Consultants, Inc., July 2014.

Project Impacts

Construction

The Project developer will attempt to park and stage for construction on-site as much as possible. During portions of the construction where off-site street surfaces are needed, the developer will submit for review and approval a traffic control plan detailing days, time of day, and safety features. Any off-site construction needs will attempted to be minimized and be conducted outside of peak traffic times. Construction worker vehicles that cannot be accommodated on site will be provided off-street parking and shuttle service to the site if needed. Therefore, construction impacts would be less than significant.

Operation

Traffic conditions after completion of the Project have been calculated by adding the Project volume to the future without traffic volume. The traffic impact of the added project traffic at the study intersections is shown in Table 3.16-10 by comparing the future without Project and future with Project traffic conditions at the study intersections. The significant impact criteria provided in Table 3.16-5 (City of Los Angeles) and Table 3.16-6 (City of West Hollywood) were applied to the future traffic conditions. As shown in Table 3.16-10, no significant traffic impacts occur at the study intersections. It should be noted that the impact analysis does not consider any changes to the existing intersection configuration (i.e., future roadway improvements). Future cumulative “with Project” peak hour traffic volumes are shown in Figure 3.16-12 for the AM Peak Hour and Figure 3.16-13 for the PM Peak Hour.

Traffic Impact Study Conclusion

The added traffic volume generated by the Project will not significantly impact the traffic flow at any of the study intersections. No traffic mitigation is required

**Table 3.16-10
Future (2018) Traffic Conditions With Project**

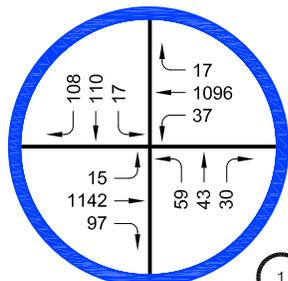
No.	Intersection	Peak Hour	Future (2018) Without Project		Future (2018) With Project			Significant Impact
			CMA	LOS	CMA	LOS	Impact	
1	Formosa Avenue and Santa Monica Boulevard	AM	0.633	B	0.634	B	+ 0.001	No
		PM	0.785	C	0.789	C	+ 0.004	No
2	La Brea Avenue and Fountain Avenue	AM	0.793	C	0.794	C	+ 0.001	No
		PM	0.851	D	0.855	D	+ 0.004	No
3	La Brea Avenue and Santa Monica Boulevard	AM	0.844	D	0.854	D	+ 0.010	No
		PM	1.041	F	1.049	F	+ 0.008	No
4	La Brea Avenue and Romaine Street	AM	0.593	A	0.601	B	+ 0.008	No
		PM	0.743	C	0.749	C	+ 0.006	No
5	La Brea Avenue and Willoughby Avenue	AM	0.554	A	0.589	A	+ 0.035	No
		PM	0.653	B	0.673	B	+ 0.020	No

6	La Brea Avenue and Melrose Avenue	AM	0.897	D	0.903	E	+ 0.006	No
		PM	0.923	E	0.929	E	+ 0.006	No
7	Orange Drive and Santa Monica Boulevard	AM	0.499	A	0.507	A	+ 0.008	No
		PM	0.667	B	0.673	B	+ 0.006	No
8	Mansfield Avenue and Melrose Avenue	AM	0.538	A	0.542	A	+ 0.004	No
		PM	0.493	A	0.500	A	+ 0.007	No
9	Highland Avenue and Santa Monica Boulevard	AM	0.957	E	0.963	E	+ 0.006	No
		PM	1.088	F	1.093	F	+ 0.005	No
10	Highland Avenue and Willoughby Avenue	AM	0.647	B	0.657	B	+ 0.010	No
		PM	0.713	C	0.727	C	+ 0.014	No
11	Highland Avenue and Melrose Avenue	AM	1.129	F	1.133	F	+ 0.004	No
		PM	1.153	F	1.161	F	+ 0.008	No

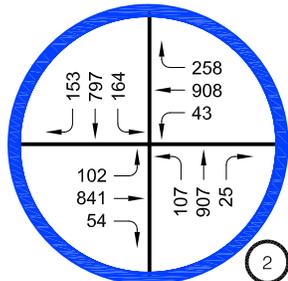
Intersections 1, 2, 3, and 4 are under the jurisdiction of the City of West Hollywood.

Source: Table 10, Traffic Impact Study, Overland Traffic, July 2014.

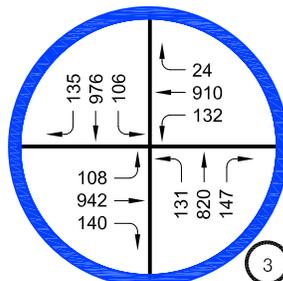
Table by CAJA Environmental Services, July 2014.



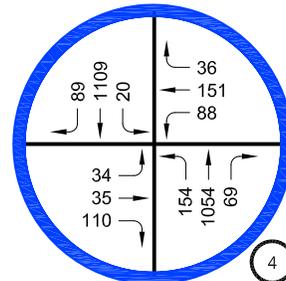
FORMOSA AVENUE & SANTA MONICA BOULEVARD



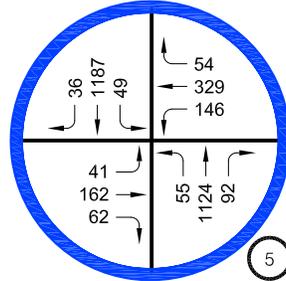
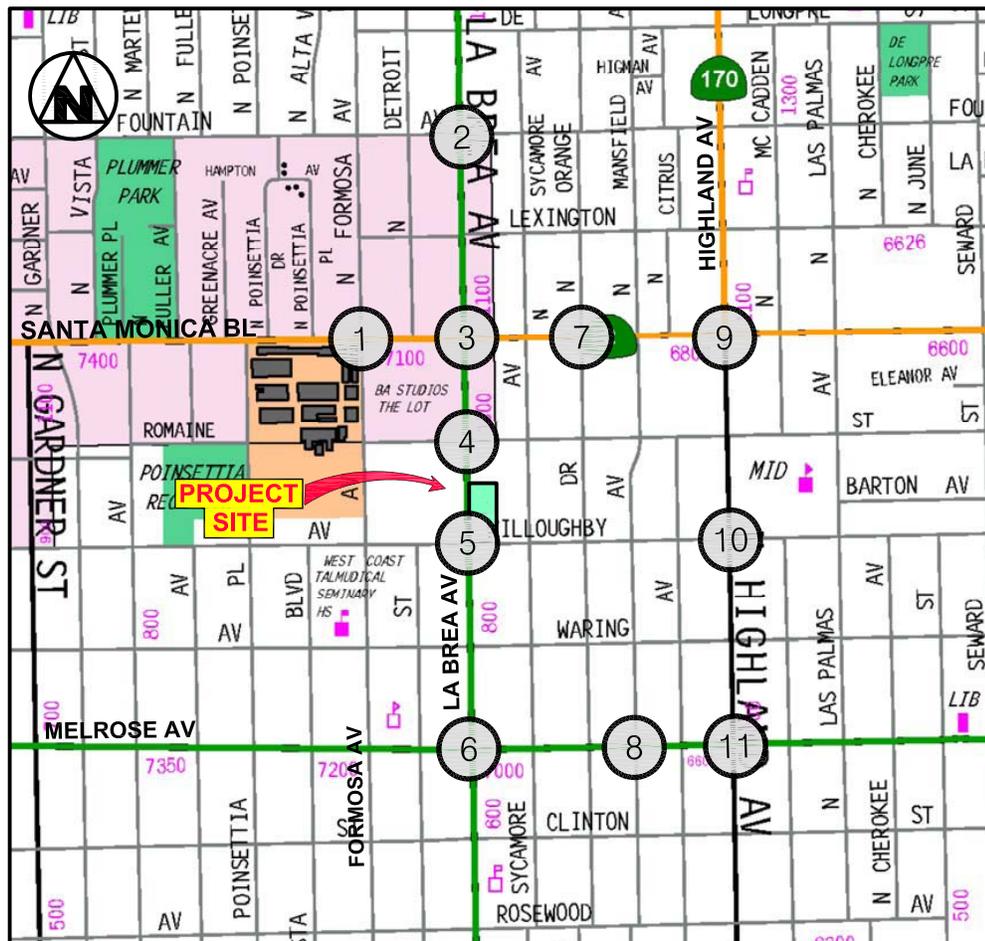
LA BREA AVENUE & FOUNTAIN AVENUE



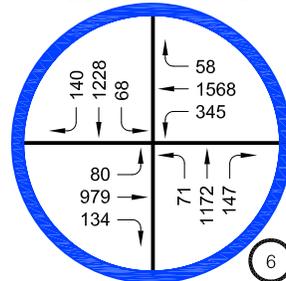
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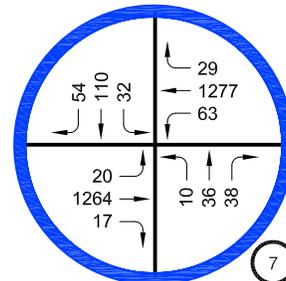
LA BREA AVENUE & ROMAINE AVENUE



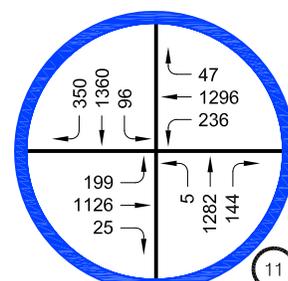
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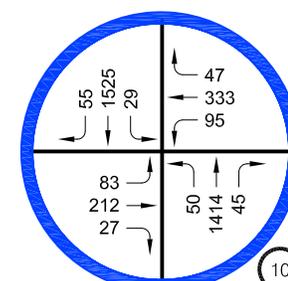
LA BREA AVENUE & MELROSE AVENUE



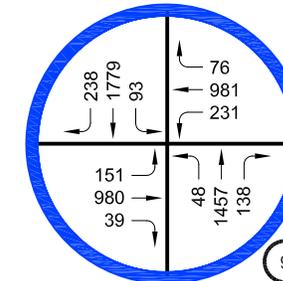
ORANGE DRIVE & SANTA MONICA BOULEVARD



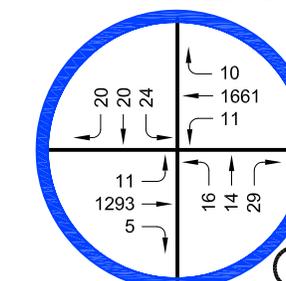
HIGHLAND AVENUE & MELROSE AVENUE



HIGHLAND AVENUE & WILLOUGHBY AVENUE

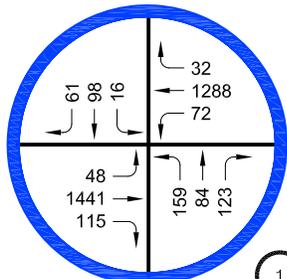


HIGHLAND AVENUE & SANTA MONICA BOULEVARD

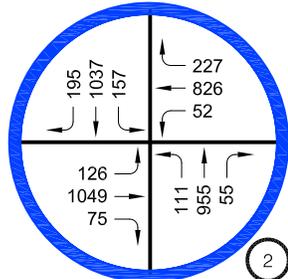


MANSFIELD AVENUE & MELROSE AVENUE

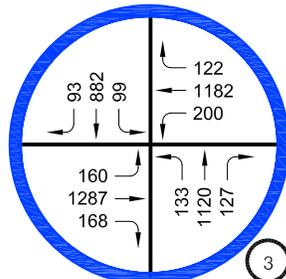
Source: Overland Traffic Consultants, Inc., July 2014.



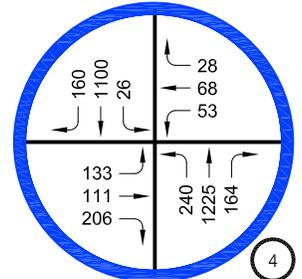
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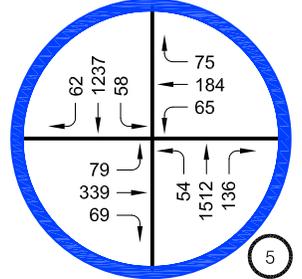
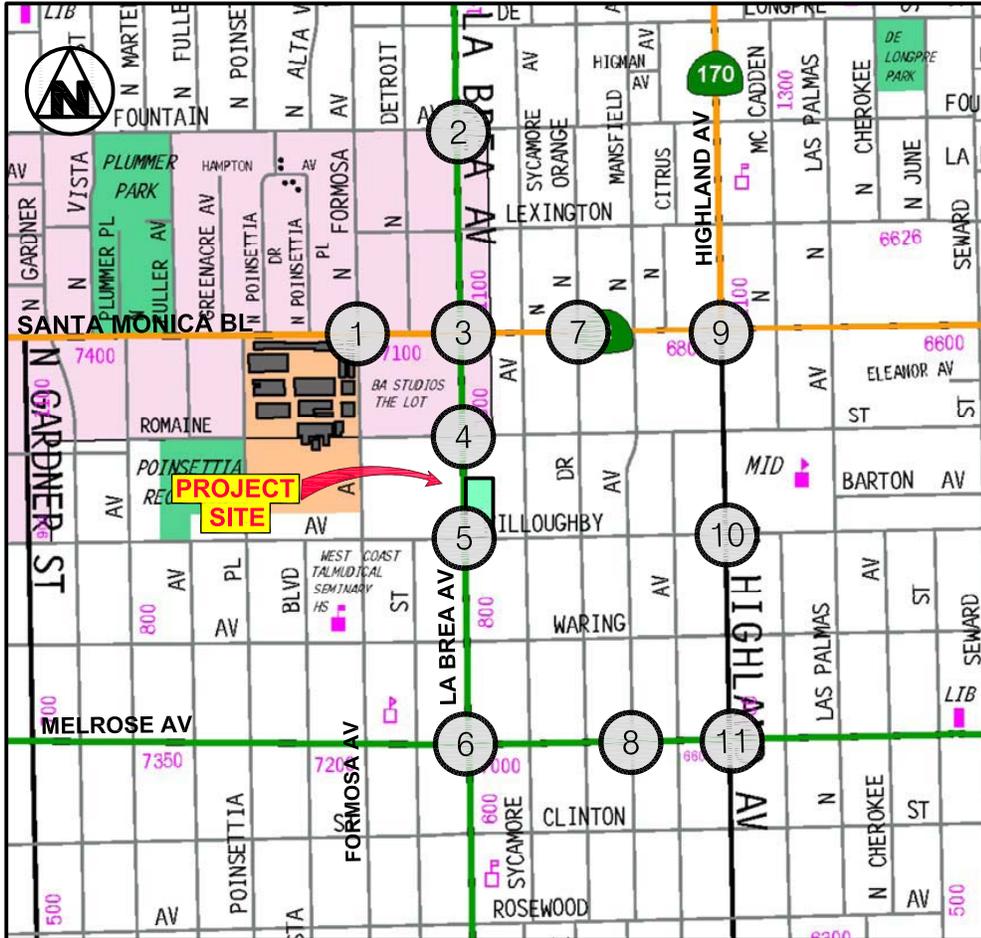
LA BREA AVENUE & FOUNTAIN AVENUE



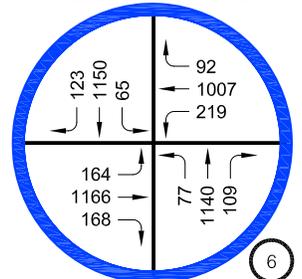
LA BREA AVENUE & SANTA MONICA BOULEVARD



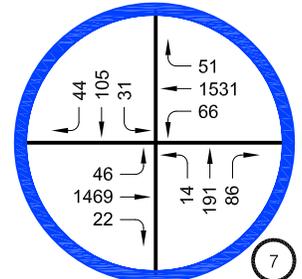
LA BREA AVENUE & ROMAINE AVENUE



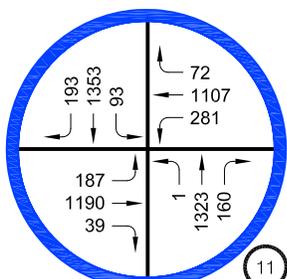
LA BREA AVENUE & WILLOUGHBY AVENUE



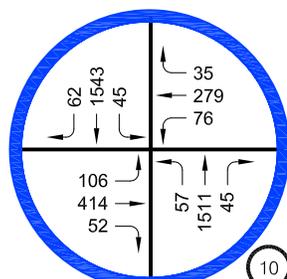
LA BREA AVENUE & MELROSE AVENUE



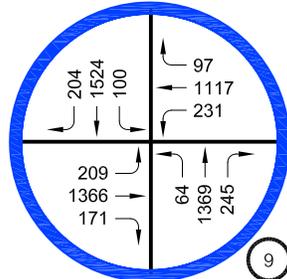
ORANGE DRIVE & SANTA MONICA BOULEVARD



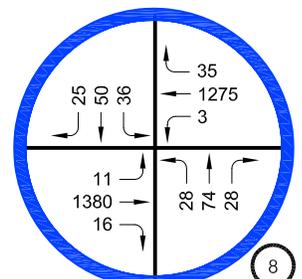
HIGHLAND AVENUE & MELROSE AVENUE



HIGHLAND AVENUE & WILLOUGHBY AVENUE



HIGHLAND AVENUE & SANTA MONICA BOULEVARD



MANSFIELD AVENUE & MELROSE AVENUE

Source: Overland Traffic Consultants, Inc., July 2014.

- b) **Would the project conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Less Than Significant Impact. A significant impact may occur if the adopted Los Angeles County Metropolitan Transportation Authority (Metro) thresholds for a significant project impact would be exceeded. The Congestion Management program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network that includes all state highways and some arterials within the County of Los Angeles.

Impacts on Regional Transportation System

The Congestion Management Program (CMP) was adopted to monitor regional traffic growth and related transportation improvements. The CMP designated a transportation network including all state highways and some arterials within the County to be monitored by local jurisdictions. If LOS standards deteriorate on the CMP network, then local jurisdictions must prepare a deficiency plan to be in conformance with the program. Local jurisdictions found to be in nonconformance with the CMP risk the loss of state gas tax funding. For purposes of the CMP LOS analysis, an increase in the freeway volume by 150 vehicles per hour during the am or pm peak hours in any direction requires further analysis. A substantial change in freeway segments is defined as an increase or decrease of 2% in the demand to capacity ratio when at LOS F. For purposes of CMP intersections, an increase of 50 vehicles or more during the am or pm peak requires further analysis.

The intersection of Santa Monica and Highland Avenue is the nearest CMP intersection. This CMP intersection is analyzed in the traffic study. The intersection has been identified to operate at LOS E during the morning peak hours and LOS F during the evening Peak hours. An increase of less than one percent (0.3% during the AM Peak and 0.7% during the PM Peak) has been identified in the study as the project impact. This is below the 2% threshold for a potential CMP intersection impact. No City of Los Angeles or CMP significant impacts are identified with construction of this Project.

The Project volumes on the area freeways are anticipated to be dispersed throughout the system. The Project is closest to the Hollywood Freeway. Based on the trip distribution patterns in the area, the project's access and proximity to destination points throughout the City, it is anticipated that, conservatively, no more than 20% of the Project volumes will be using any one segment of the freeway. The maximum number of freeway trips on any one freeway would then be 21 vehicles during the peak hours. This amount of traffic is below the threshold needed for further evaluation. No CMP intersection or freeway impacts are anticipated. Therefore, the Project would have a less than significant impact.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. This question would apply to the Project only if it were an aviation-related use. The Project Site does not contain any aviation-related uses and the Project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the Project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Design Feature (Dedications)

La Brea Avenue provides the western boundary of the Project Site. The current right-of-way along the Project frontage is 100 feet. The Transportation Element of the General Plan requires 104 feet of right-of-way with an 80-foot roadway and 12-foot sidewalks. The Project may need to dedicate 2 feet of property along La Brea Avenue depending on the requirements in place at the time of building permits. Any potential highway dedication would not create a hazard.

Pedestrian Safety

Temporary impacts to pedestrian safety could occur during construction, especially on La Brea Avenue and Willoughby Avenue. The alley is not a highly impacted pedestrian corridor and is primarily used for vehicle parking and rear access to the adjacent uses. The Project will comply with **Mitigation Measure 16-1**. This measure will ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. The Project would be exporting more than 20,000 cy of material and will obtain a Haul Route Approval. Therefore, impacts would be reduced to less than significance.

Proximity to a School

The Project Site is in close proximity to several schools, the nearest two being Cheder of Los Angeles, located at 801 N. La Brea Avenue, approximately 550 feet southwest, and Melrose Elementary, located at 731 Detroit Street, approximately 850 feet southwest. The schools would still be generally shielded from the Project Site by the La Brea Gateway development directly south, Willoughby Avenue, and intervening residential and commercial buildings to the southwest. These intervening structures and redundant street network ensure that construction activities do not have the potential to impact the normal

operation of any school, including bus routes and pedestrian walkways. Construction activities would be limited to on-site work. Construction activities do not have the potential to impact the normal operation of any school, including bus routes and pedestrian walkways. Haul trucks and delivery trucks would access the Project Site from La Brea Avenue, which is not near any schools. The study intersections (which currently could include bus routes) would operate at less than significant levels. There would be no impact. The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site.

Mitigation Measure

16-1 Safety Hazards

- The developer shall install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety.
- Projects involving the import/export of 20,000 cubic yards or more of dirt shall obtain haul route approval by the Department of Building and Safety.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site.

Access & Circulation

The Project proposes a driveway off of La Brea Avenue near the Project Site's northerly property line and a driveway off of the north-south alley along the eastern boundary of the Project Site. On-site loading is proposed off of the alley along the eastern boundary of the Project Site. Pedestrian access would be provided on La Brea Avenue, Willoughby Avenue, and the alley (emergency access).

Pursuant to the Los Angeles Municipal Code (LAMC), the Project's mix of uses is required to provide 290 parking spaces. The Project will provide 303 spaces on levels B1, 2, and 3. A basement level of parking will provide 111 spaces for the use of the retail tenant. The residential parking will be provided on two levels (L2 and L3) above the ground floor retail with 192 parking spaces. Table 2-2, Vehicle Parking, in Section 2 of this IS/MND, provides the amount of required parking by land use type and quantity. The Project will not result in inadequate emergency access to the Project Site or surrounding area because no intersections would be significantly impacted due to the Project. Access, including driveway widths and aisles would comply with LAMC and Fire Code access requirements. Impacts related to emergency access would be less than significant.

- f) **Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

Less Than Significant Impact. A significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Public Transit

Public transportation in the Project area is provided by the Metropolitan Transportation Authority (Metro), the City of Los Angeles Department of Transportation Dash service (DASH), subway Metro Rail, and Metro Express. There is a Metro Red Line Rail station located at Hollywood Boulevard and Highland Avenue, located approximately one mile from the Project Site. Metro provides Metro Rail, local and rapid bus lines through this area of Hollywood.

- Metro Local Route 212/312 operates between Hollywood and the Metro Green Line Hawthorn/Lennox station including Miracle Mile, Baldwin Hills, Inglewood, and Hawthorne. Route 212/312 connects to the Hollywood/Highland Metro Red Line station.
- Antelope Valley Transit Services operates Route 786 from the Antelope Valley area with limited stops to West Los Angeles, Century City, Beverly Hills, and Hollywood. A stop is provided at Santa Monica Boulevard and La Brea Avenue.
- Metro Local Route 156/656 operates between Hollywood and East San Fernando Valley including Studio City, Van Nuys and Panorama City. A stop is provided at Santa Monica Boulevard and Highland Boulevard.
- Metro Route 4 operates between Downtown Los Angeles, Silver Lake, Hollywood, West Hollywood, Beverly Hills, Century City, West Los Angeles and Santa Monica. Early morning and night owl services are provided on an extended route. A stop is provided at Santa Monica Boulevard and La Brea Avenue.
- Metro Rapid Route 704 operates along the same route as Metro Route 4 but with limited stops to save travel time and provide faster services between the communities. A stop is provided at Santa Monica Boulevard and La Brea Avenue.
- The Metro Red Line and local lines provide connections throughout Hollywood to and from other services.
- Local shuttle lines are provided by DASH Hollywood, Hollywood/Wilshire and Beachwood Canyon. Transfer opportunities are available to/from Hollywood from the local and regional lines.

Transit Analysis

The Project is forecast to generate a net gain of approximately 2,072 weekday daily trips with 93 trips during the AM Peak Hour and 186 trips during the PM Peak Hour. As per Congestion Management Program (CMP) 2008 guidelines, person trips can be estimated by multiplying the total trips generated by 1.4. The trips assigned to transit may be calculated by multiplying the person trips generated by 3.5%. The CMP Transit trip generation calculation is displayed in Table 3.16-11. This level of transit increase is not expected to adversely affect the current ridership of the transit services in the area. The Project would not create any significant impacts on the transit facilities.

**Table 3.16-11
Transit Trips**

Trips	Daily	AM Peak Hour	PM Peak Hour
Project Trips	2,072	93	186
Person Trips (x 1.4)	2,901	130	260
Transit Trips (person trips x 3.5%)	102	5	5
<i>Source: Table 12, Traffic Impact Study, Overland Traffic, July 2014. Table by CAJA Environmental Services, July 2014.</i>			

Bicycles

The City of Los Angeles adopted a 2010 Bicycle Master Plan to encourage alternative modes of transportation throughout the City of Los Angeles. The Master Plan was developed to provide a network system that is safe and efficient to use in coordination with the vehicle and pedestrian traffic on the City street systems. The Master Plan has mapped out the existing, funded and potential future Bicycle Paths, Bicycle Lanes, and Bicycle Routes. A brief definition of the bicycle facilities is provided below:

- **Bicycle Path** – A bicycle path is facility that is separated from the vehicular traffic for the exclusive use of the cyclist (although sometimes combined with a pedestrian lane). The designated path can be completely separated from vehicular traffic or cross the vehicular traffic with right-of-way assigned through signals or stop signs.
- **Bicycle Lane** – A bicycle lane is typically provided on street with a designated lane striped on the street for the exclusive use of the cyclist. The bicycle lanes are occasionally curbside, outside the parking lane, or along a right turn lane at intersections.
- **Bicycle Route** – A bicycle route is a designated route in a cycling system where the cyclist shares the lane with the vehicle. Cyclist would follow the route and share the right-of-way with the vehicle.

La Brea Avenue, Highland Avenue and Santa Monica Boulevard are identified as part of the backbone bikeway network. They are identified for Bicycle Lanes through the City of Los Angeles. Waring Avenue, Orange Drive and Formosa Avenue are identified as part of the neighborhood bikeway network. They are identified as Bicycle Friendly Streets.

Municipal code 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. Commercial uses, including the proposed retail shopping center, require one short term and one long term bicycle space per 2,000 square feet of floor area. Multi-family residential requires one long term bicycle parking space per unit and one short term bicycle parking space per 10 units. Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. As shown in Table 2-3, Bicycle Parking Required, in Section 2 of this IS/MND, the Project will provide, at a minimum, 36 short term and 188 long term bicycle spaces for both the Projects' retail and residential components. If the Project is reduced, the corresponding bicycle parking spaces may be reduced to meet code requirements. The Project would not impede development of bicycle facilities from the Master Plan and would provide adequate bicycle parking. Therefore, impacts to bicycles would be less than significant.

Pedestrian Facilities

Construction activities are expected to be fully contained within the Project Site and are not expected to impede access to the sidewalk along La Brea Avenue and Willoughby Avenue. Temporary fencing and scaffolding/walkways will be provided to protect pedestrians from the construction site activities (see **Mitigation Measure 14-3**). During operation, the Project would not impact any sidewalks. There is a controlled/lighted crosswalk at the intersection of La Brea Avenue/Willoughby Avenue and La Brea Avenue/Romaine Street. There are no public benches or seating along the sidewalks. The Project will not conflict with public transit, bicycles, or pedestrian facilities. Therefore, a less than significant impact will occur.

17. UTILITIES AND SERVICE SYSTEMS

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

G-1 Response from Los Angeles Bureau of Sanitation, July 14, 2014.

G-2 Response from Los Angeles Department of Water and Power, August 18, 2014.

G-3 Response from Southern California Gas Company, July 29, 2014.

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. A significant impact may occur if a project would discharge wastewater whose content exceeds the regulatory limits established by the governing agency. The Los Angeles Water Quality Control Board (LAWQCB) implements programs to protect all waters in the coastal watersheds for Los Angeles and Ventura counties. LAWQCB's Water Quality Control Plan for the Los Angeles Region (the "Basin Plan") establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.¹⁸⁹ Wastewater reclamation and treatment in the City of Los Angeles is provided by the City of Los Angeles Department of Public Works' Bureau of Sanitation (LABS), which operates two treatment plants (Hyperion and Terminal Island) and two water reclamation plants in accordance with the treatment requirements of the LAWQCB and/or water reclamation requirements of the Basin Plan.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP)¹⁹⁰, which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment,¹⁹¹ and currently treats an average daily flow of approximately 362 mgd.¹⁹² Thus, there is a remaining capacity of approximately 88 mgd. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LAWQCB's discharge policies for Santa Monica Bay. Additionally, the City's Sewer Allocation Ordinance (Ordinance No. 166,060)

¹⁸⁹ *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region (4)(adopted June, 1994, updated July 2006).*

¹⁹⁰ *LA Sewers: http://www.lasewers.org/treatment_plants/about/index.htm, accessed July 29 2014.*

¹⁹¹ *Los Angeles Sanitation: <http://www.lacitysan.org/irp/Wastewater.htm>, accessed July 29, 2014.*

¹⁹² *LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: <http://www.lacitysan.org/wastewater/factsfigures.htm>, accessed July 29, 2014.*

limits the annual increase in wastewater flow to HTP to five mgd.¹⁹³ This allocation allowance is monitored by the HTP and the Project’s contribution would not affect the amount. Further, the HTP is a public facility and is, therefore, subject to the state’s wastewater treatment requirements. The Project’s residential and retail discharge is typical of the area and would not require any on-site treatment before flowing to the sewer. Therefore, the Project would have a less than significant impact with regard to wastewater treatment.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Wastewater Generation, Treatment Facilities, and Existing Infrastructure

As shown on Table 3.17-1, Project Estimated Wastewater Generation, it is estimated the Project will generate a net total of approximately 21,553 gallons per day (gpd) (or 0.22 mgd) of wastewater. This is a net total because the gross total was reduced by the wastewater generation of the existing onsite commercial use.

**Table 3.17-1
Project Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Existing (to be removed)			
Storage	16,255 sf	30 gallons / 1,000 sf	488
Existing			(488)
Project			
Retail	37,385 sf	80 gallons /1,000 sf	2,991
Residential – Studio	84 units	75 gallons / unit	6,300
Residential – 1-bedroom Loft and 2-bedroom	85 units	150 gallons / unit	12,750
Proposed			22,041
Total Increase (Proposed – Existing)			21,553

¹⁹³ Los Angeles City Clerk, Ordinance 166,060: <http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=87-2121>

**Table 3.17-1
Project Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
<p><i>Note: sf = square feet; gpd = gallons per day</i> <i>Rates: Response from Los Angeles Bureau of Sanitation, July 14, 2014. Included in the Appendices.</i> <i>Retail – Less than 100,000 square feet is 25 gallons/1,000 sf</i> <i>Table: CAJA Environmental Services, November 2014.</i></p>			

The Project Site will be served by LABS, which provides municipal wastewater services to the City. The sewer infrastructure includes:

- 8-inch line on Willoughby Avenue and 12-inch line on La Brea Avenue. The flow from both existing lines join to feed a 27-inch line on Rosewood Avenue before discharging into a 30-inch sewer line on Beverly Boulevard.¹⁹⁴

The Project Site is currently developed and adequately served by the existing wastewater conveyance system. As part of the building permit process the lead agency would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project’s wastewater flows. The standard procedure is that further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity (see **Mitigation Measures 17-1**). A final approval for sewer capacity and connection permit will be made at that time.¹⁹⁵ Implementation of these prescribed mitigation measures will ensure that the Project’s impacts to the wastewater conveyance system will be less than significant.

The wastewater generated by the Project will be similar to other residential and retail uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system (remaining capacity of approximately 88 mgd or at 80 percent capacity), and thus, the increase in wastewater generation would not have a significant impact on treatment plant capacity. As HTP complies with the state’s wastewater treatment requirements and the Project’s wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts with regard to wastewater treatment requirements will be less than significant.

¹⁹⁴ Response from Los Angeles Bureau of Sanitation, July 14, 2014. Included in the Appendices.

¹⁹⁵ Response from Los Angeles Bureau of Sanitation, July 14, 2014. Included in the Appendices.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) will be implemented as part of the Project and will help reduce the amount of project-generated wastewater. Therefore, with the mitigation detailed below, impacts to wastewater treatment facilities and existing infrastructure will be less than significant.

Water Consumption and Treatment Facilities

The Los Angeles Department of Water and Power (LADWP) provides municipal water services to the City, and is responsible for providing water to the Project Site. As shown on Table 3.17-2, Project Estimated Water Consumption, it is estimated the Project will consume a net total of approximately 25,683 gallons per day (gpd) (or 0.025 mgd or 29 acre-feet per year¹⁹⁶) of water. This is a net total because the gross total was reduced by the water consumption of the existing onsite commercial use.

**Table 3.17-2
Project Estimated Water Consumption**

Land Use	Size	Water Consumption Rates	Total (gpd)
Existing (to be removed)			
Storage	16,255 sf	38.4 gallons / 1,000 sf	624
Existing			(624)
Project			
Retail	37,385 sf	102.4 gallons /1,000 sf	3,828
Residential – Studio	84 units	88.5 gallons / unit	7,434
Residential – 1-bedroom + Loft and 2-bedroom	85 units	177 gallons / unit	15,045
Proposed			26,307
Total Increase (Proposed – Existing)			25,683
<p><i>Note: sf = square feet; gpd = gallons per day</i> <i>Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.</i> <i>Rates: Response from Los Angeles Bureau of Sanitation, July 14, 2014. Included in the Appendices.</i> <i>Retail – Less than 100,000 square feet is 25 gallons/1,000 sf</i> <i>Table: CAJA Environmental Services, November 2014.</i></p>			

LADWP provides service to the Project Site via an existing 6-inch water main in La Brea Avenue. There are no known problems or deficiencies in the Project area. The Water Service Organization (WSO) should

¹⁹⁶ 1 acre foot = 325,851.429 US gallons

be able to provide the domestic needs of the Project from the existing water system. The WSO cannot determine the impact on the existing water system until the fire demands of the Project are known. Once a determination of the fire demands has been made, LADWP will assess the need for additional facilities, if needed.¹⁹⁷ This is described as **Mitigation Measure 17-2**.

LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of LAAFP is 600 mgd with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season. The Project's water consumption increase represents approximately 0.05 percent and 0.02 percent of the remaining capacity currently available at LAAFP during the summer and non-summer months, respectively. Therefore, impacts to water treatment facilities and existing infrastructure would be less than significant.

If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. **Mitigation Measure 17-2** will ensure that the Project's impacts to the water conveyance system would be less than significant.

Mitigation Measures

17-1 Wastewater Service

- As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project's wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety.

17-2 Water Service

- As part of the normal construction/building permit process, the Project Applicant shall confirm with the LADWP Water Service Organization (WSO) that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. If the water infrastructure has insufficient capacity, then the Project Applicant shall be required to build water lines to a point in the system with sufficient capacity. If street closures for construction is required, the Project applicant shall

¹⁹⁷ Response from Los Angeles Department of Water and Power, August 22, 2014.

coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety.

- c) **Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Less Than Significant Impact. A significant impact may occur if the volume of storm water runoff increases to a level exceeding the capacity of the storm drain system serving the Project Site or if a project would substantially increase the probability that polluted runoff would reach the storm drain system. The Project Site is located in an urbanized area of the City. The Project Site is currently developed with two buildings, surface parking, and a vacant parcel that was previously occupied with buildings. The Project will similarly cover the entire site with a building. Thus, the Project would not be altering the amount of impervious surface that affects runoff. Runoff currently flows toward the existing storm drain system, and the Project will not substantially alter the amount of runoff. Impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles, SWRC, and Low Impact Development requirements. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for polluted runoff to a less than significant level.

- d) **Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

Water Supply Assessment

State CEQA Guidelines Section 15083.5 requires a lead agency to identify water systems to provide water supply assessments for projects over specified thresholds. For any residential subdivision project Senate Bill (SB) 221 requires that the lead agency include a requirement that a sufficient water supply shall be available to serve the residential development. A residential subdivision is a proposed residential development of more than 500 dwelling units. Thus, the Project is not subject to SB 221 as it does not include a residential development of more than 500 dwelling units. SB 610 requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand for

certain development projects that are otherwise subject to CEQA review. Existing law identified those certain projects as follows:

- (a) Residential developments of more than 500 dwelling units;
- (b) Shopping centers or businesses employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- (c) Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet;
- (d) Hotels or motels with more than 500 rooms;
- (e) Industrial or manufacturing establishments housing more than 1,000 persons or having more than 650,000 square feet of 40 acres;
- (f) Mixed use projects containing any of the foregoing; or
- (g) Any other project that would have a water demand at least equal to a 500-dwelling unit project.

The Project is not subject to SB 610 as it does not meet the listed requirements because the Project only includes 169 residential units and the Project's retail component would employ fewer than 1,000 persons.

Drought Conditions

On January 17, 2014, Governor Jerry Brown officially declared California in a drought emergency. LADWP has activated the Water Conservation Response Unit in order to implement the mandatory Emergency Water Conservation Plan Ordinance - Phase 2. This includes an odd/even numbered address watering calendar. In addition, customers cannot: 1) Use water on hard surfaces such as sidewalks, walkways, driveways, or parking areas (with exception of water brooms); 2) Irrigate landscaping between the hours of 9 a.m. and 4 p.m.; 3) Allow excess water from sprinklers to flood gutters; 4) Use water to clean, fill, or maintain decorative fountains unless the water is part of a recirculation system; 5) Serve water to customers in eating establishments, unless requested; and 6) Allow irrigation leaks to go unattended.¹⁹⁸ The 2010 Urban Water Management Plan takes into account drought conditions. After adjusting for economy and drought conditions, projected water demands can vary by approximately ± 5 percent in any given year due to average historical weather variability. This means that water demands under cool/wet weather conditions could be as much as 5 percent lower than normal demands on average;

¹⁹⁸ LADWP, *Drought Information*: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation/a-w-c-droughtbusters?_adf.ctrl-state=nviecbhak_4&_afLoop=932704326968157

while water demands under hot/dry weather conditions could be as much as 5 percent higher than normal demands on average.¹⁹⁹

The Project will use approximately 29 acre-feet per year. The 2010 Urban Water Management Plan projects a supply of 614,800 AFY in 2015 and 652,000 AFY in 2020.²⁰⁰ The Urban Water Management Plan forecasts water demand by estimating baseline water consumption by use (single family, multifamily, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on 2008 SCAG growth forecasts.²⁰¹ The 2008 SCAG Growth Forecast Report models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).²⁰² Neither the Urban Water Management Plan forecasts, nor the 2008 SCAG Growth Forecast Report include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use. Thus, the Project's General Plan Amendment and Zone Change do not affect the reliability of the 2008 SCAG Growth Forecast Report or the 2010 Urban Water Management Plan forecasts. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. In addition, **Mitigation Measures 17-3, 17-4, 17-5, and 17-6** would ensure that impacts related to the project's water demand remain less than significant.

Mitigation Measures

17-3 Utilities (Local Water – Landscaping)

- The project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g, use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

¹⁹⁹ 2010 Urban Water Management Plan, Los Angeles, pg. 46: <http://www.ladwp.com/ladwp/cms/ladwp014334.pdf>, November 22, 2013.

²⁰⁰ 2010 Urban Water Management Plan, Los Angeles, pg. 20: <http://www.ladwp.com/ladwp/cms/ladwp014334.pdf>, November 22, 2013.

²⁰¹ 2010 Urban Water Management Plan, Los Angeles, pgs. 42-43:

²⁰² SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.

- In addition to the requirements of the Landscape Ordinance, the landscape plan 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
 - A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for existing and expanded irrigated landscape areas totaling 5,000 sf and greater.

17-4 Utilities (Local Water Supplies – All New Construction)

- 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.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- A separate water meter (or submeter), flow sensor, and master valve shutoff shall be installed for all landscape irrigation uses.
- Single-pass cooling equipment shall be strictly prohibited from use. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements. (Single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system.)

17-5 Utilities (Local Water Supplies – New Commercial or Industrial)

- All restroom faucets shall be of a self-closing design.

17-6 Utilities (Local Water Supplies – New Residential)

- Install no more than one showerhead per shower stall, having a flow rate 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.
- 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.

e) **Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?**

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The Project’s generation of 0.019 mgd of wastewater would be sufficiently accommodated as part of the remaining 88 mgd or 80 percent of treatment capacity currently available at HTP. Also, the HTP has sufficient capacity for the Project’s flow.²⁰³ Therefore, impacts to wastewater treatment would be less than significant.

f) **Would the project be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?**

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. 43 percent of the waste generated in the City is disposed of at the Sunshine Canyon City/County Landfill (the “Sunshine Canyon Landfill”), with 20 percent to Chiquita Canyon Landfill, and the remaining amounts sent to over a dozen other landfills, recycling, refuse-to-energy, or resource recovery facilities.²⁰⁴

²⁰³ Response from Los Angeles Bureau of Sanitation, July 14, 2014. Included in the Appendices.

²⁰⁴ City of Los Angeles, Fact Sheet: Solid Waste Facilities: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf

Construction

Construction of the Project will generate minimal amounts of construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged. Materials not recycled would be disposed of at local landfills.

Demolition of the existing buildings (16,255 square feet) would produce demolition waste and recycling opportunities of raw materials and export of 30,000 cy of dirt. Construction of the 150,042 square feet of new floor area would generate approximately 329 tons of construction waste.²⁰⁵ Core/shell construction is estimated to take approximately 18 months. Therefore, Project construction would generate approximately 0.91 tons per day of construction waste on average throughout the construction phase.²⁰⁶

According to CalRecycle (California Department of Resources Recycling and Recovery), the Sunshine Canyon Landfill is estimated to close in 2037. It has approximately 112.3 million cubic yards (cy) of remaining capacity out of a total capacity of 140.9 million cy, and a maximum permitted daily intake of 12,100 tons per day (tpd).²⁰⁷ Space is calculated by volume, with 1.7 cubic yards equaling one ton of trash. Projections of capacity are tied to how tightly the trash is compacted.²⁰⁸ As of September 30, 2013 (the latest data provided), Sunshine Canyon Landfill accepted approximately 7,800 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).²⁰⁹ Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 4,300 tpd during each weekday and 9,100 tpd on Saturday. It is anticipated that the Project's limited demolition and construction debris (0.91 tpd, and 30,000 cy of exported dirt will be transported to the Sunshine Canyon Landfill in Sylmar (as shown in Figure 2-21, Haul Route Map).

²⁰⁵ Based on 4.02 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. *Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-2, page A-1*).

²⁰⁶ 18 months x 20 working days per month = 360 working days. 329]tons / 360 days = 0.91 tons per day.

²⁰⁷ State of California Department of Resources Recycling and Recovery, *Solid Waste Facility Listing/Details Page, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000)*, website: <http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail>, May 30, 2014.

²⁰⁸ Sunshine Canyon: <http://www.sunshinecanyonlandfill.com/home/Future.html>, May 30, 2014.

²⁰⁹ Sunshine Canyon Landfill Newsletter, Fall 2013, website: http://www.sunshinecanyonlandfill.com/home/newsletter/fall_2013_newsletter.pdf, May 30, 2014.

A majority of the City's construction and demolition waste was sent to the Puente Hills Landfill.²¹⁰ The Puente Hills Landfill closed on October 31, 2013, when its permit expired. However, there are other County Sanitation Districts' facilities available for disposal and recycling, including the nearby Puente Hills Materials Recovery Facility (MRF) that shares the same entrance as the Landfill. The Puente Hills MRF accepts all kinds of waste for recycling and disposal, including commercial, construction/demolition, and residential wastes.²¹¹ The Puente Hills MRF is permitted to accept 4,400 tons per day and 24,000 tons per week of municipal solid waste.²¹² As of 2014, the Puente Hills Intermodal Facility provide a Materials Recovery Facility/Transfer Station for the Waste to Rails system to the Mesquite Regional Landfill in Imperial County.²¹³ The Mesquite Landfill can accept 20,000 tons per day, with an overall capacity of 600 million tons and a lifespan of 100 years.²¹⁴ The Mesquite Landfill would have adequate capacity to accept the Project's demolition and construction waste.

Compliance with AB 939 would require a minimum of 50 percent of demolition and construction debris to be recycled. The following mitigation measures would ensure that Project recycles its demolition and construction waste (see **Mitigation Measures 17-7 to 17-9**). Therefore, short-term construction impacts to landfills and solid waste services will be less than significant.

Mitigation Measures

17-7 Utilities (Solid Waste Recycling – Construction/Demolition)

Prior to the issuance of any construction permit, the Project Applicant shall provide a copy of the receipt or contract from a waste disposal company providing services to the project, specifying recycled waste service(s), to the City of Los Angeles Department of Building and Safety. The construction contractor(s) shall only contract for waste disposal services with a company that recycles construction-related waste.

17-8 Utilities (Solid Waste Recycling)

To facilitate on-site separation and recycling of demolition and construction-related wastes, the contractor(s) shall provide temporary waste separation bins on-site during demolition and

²¹⁰ City of Los Angeles, *Fact Sheet: Solid Waste Facilities*: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf

²¹¹ County Sanitation Districts, *Puente Hills Landfill Closing on October 31, 2013*: <http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1>, accessed February 4, 2014.

²¹² County Sanitation Districts, *Puente Hills MRF Fact Sheet*: <http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1>, accessed February 4, 2014.

²¹³ Puente Hills Landfill: <http://www.lacsd.org/civica/filebank/blobload.asp?BlobID=3708>, February 4, 2014.

²¹⁴ Mesquite Regional Landfill: <http://www.mrlf.org/index.php?pid=5>, February 4, 2014.

construction. These bins shall be emptied and the contents recycled accordingly as a part of the project's regular solid waste disposal program.

17-9 Utilities (Solid Waste Disposal)

All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.

Operation

As shown on Table 3.17-3, Project Estimated Solid Waste Generation, it is estimated the Project will generate a net total of approximately 2,047 pound per day (or 1.02 tons per day) of solid waste. This is a net total because the gross total was reduced by the solid waste of the existing onsite commercial use.

**Table 3.17-3
Project Estimated Solid Waste**

Land Use	Size	Solid Waste Generation Rates	Total (pounds)
Existing (to be removed)			
Storage	15 employees	13.82 pounds / employee	207
Existing			(207)
Project			
Retail	37,385 sf	5 pounds /1,000 sf	187
Residential	169 units	12.23 pounds / unit	2,067
Proposed			2,254
Total Increase (Proposed – Existing)			2,047

Note: sf = square feet
Rates: CalRecycle Estimated Solid Waste Generation Rates:
<http://www.calrecycle.ca.gov/wastechar/wastegenrates/>
Storage: No rate for storage. Closest representative is warehouse: 13.82 pounds / employee
Retail: 5 pounds/1,000 sf
Residential: 12.23 pounds/unit
Table: CAJA Environmental Services, November 2014.

The Sunshine Canyon Landfill can accept 12,100 tpd (and currently accepts 9,000 tpd on weekdays and 3,000 tpd on Saturday), and could therefore accommodate the additional approximately 1.02 tons per day increase in solid waste resulting from the Project. After Sunshine Canyon closes, the Puente Hills MRF

and Mesquite Canyon Landfills would have adequate capacity for Projection operation waste. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. The City had an accelerated goal of 75 percent by 2013. During fiscal 2012-13, the City exceeded the mandated 75 percent diversion rate goal, achieving 76.4 percent,²¹⁵ with the goal to achieve a 90 percent diversion by 2025.²¹⁶ **Mitigation Measure 17-10** would ensure that solid waste is separated and disposed/recycled properly during operation further mitigating any potential solid waste impact from Project operations. Therefore, the impact associated with solid waste during operation of the Project would be less than significant.

Mitigation Measure

17-10 Utilities (Solid Waste Recycling - Operational)

Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the project's regular solid waste disposal program.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated on-site by the Project will be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Integrated Resources Plan, which is the long-range solid waste management policy plan for the City through 2025, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills.

The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction, and the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials. Waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Sunshine Canyon Landfill has adequate capacity and is slated to

²¹⁵ City of Los Angeles, Department of Public Works, *Year at a Glance, 2012-13*: http://www.lacitysan.org/general_info/pdfs/BOS_YAAG_2012.pdf, accessed May 30, 2014.

²¹⁶ City of Los Angeles, Department of Public Works, *A Five-Year Strategic Plan, Fiscal Years 2013/14-2017/18*: http://www.lacitysan.org/general_info/pdfs/Strategic_Plan2013-14.pdf, accessed May 30, 2014.

close in 2037. The Waste-By-Rails program to the Mesquite Landfill would have adequate capacity and is slated to operate for 100 years. The Project would comply with federal, state, and local regulations, and as such, impacts would be less than significant.

18. MANDATORY FINDINGS OF SIGNIFICANCE

- a) **Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Less Than Significant Impact. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues. The Project Site is located in an urbanized area of the City. The Project Site's northern half contains two buildings operating as storage space and the southern half contains vacant land (formerly occupied with retail buildings which were removed). There are two street trees on the City sidewalk along La Brea Avenue, in front of the vacant land southern half. These are off-site street trees as part of the City's planting program and not natural to the location. There are ornamental plants and sidewalk grass strips in front of the 932 La Brea building. The Project will have a less than significant impact to historic resources. The Project will have a less than significant impact on archeological resources, paleontological resources, and human remains, after the implementation of **Mitigation Measures 5-1, 5-2, and 5-3**, respectively. The Project will not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the Project will be less than significant.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The Project will not combine with related projects to create a cumulatively significant impact in any of the environmental issue areas analyzed in the Draft IS/MND.

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. An adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B). The lead agency may also blend the “list” and “plan” approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project,

were identified for evaluation. The locations of the related projects are shown in Figure 3.16-8 and described in Table 3.16-8. All the related projects are in the City of Los Angeles, except for Nos. 3, 6, 13, 14, 17, 20, 39, 40, 47, 49, 50, 51, and 52 which are in the City of West Hollywood.

The related projects include a variety of land uses, including approximately:

- 5,894 residential units (apartments, condominiums, student and faculty/staff housing, live/work)
- 104,992 square feet of health club
- 3,276,574 square feet of office (various types)
- 359 students facilities (daycare, kindergarten, tutoring, and school)
- 736,175 square feet of retail
- 1,402 hotel rooms
- 97,943 square feet of restaurant
- 25,894 square feet of bar/lounge, special event and banquet space
- 24,900 square feet of storage, studio sound stage, and stage support space

The nearest related projects to the Project Site are:

- No. 15 – 915 La Brea (La Brea Gateway), an under construction project of apartments and market.
- No. 37 – 936 La Brea, a renovation and expansion of office and retail uses.
- No. 54 – 925 La Brea, an office and retail project.

Related Projects Nos. 37 and 54 contain office uses, which is a different uses than the Project, which proposes residential and retail uses. Related Project No. 15, across La Brea Avenue would contain residential and retail uses, same as the Project. Each of these related projects would be subject to their own CEQA analysis (MND or EIR) to evaluate potential impacts and provide mitigation measures where appropriate. Related Project No. 15 is already under construction and expected to be occupied in the 3rd quarter 2015. As such, it has already been subject to CEQA analysis with mitigation measures to reduce impacts. Related Project No. 37 would be located adjacent to the north of the Project Site. It is an existing building that has been renovated/expanded. Related Project No. 54 would be located across La Brea Avenue and the Project Site, at a distance approximately the same as Related Project No. 15 (which would be adjacent to No. 54). The other related projects have several intervening buildings and major

roadways/freeway in between, and are at least 3 blocks away or more, which will ensure that any other localized impacts of the related project would not combine with the Project.

Aesthetics

Development of the Project in conjunction with the related projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With respect to aesthetics and views, and shade and shadow impacts, none of the related projects (with the exception of No. 15, 37, and 54) are located in proximity to the Project Site such that their development would affect the aesthetic character of the site or its immediate surroundings. Related Project No. 37 is directly adjacent to the north of the Project Site and is existing building that has been renovated/expanded. There are no scenic or protected views in the area, and the view corridor along La Brea Avenue is not unique or provides a distinct vantage point, especially to the north in the directions of related projects Nos. 15, 37 and 54. Development of related projects is expected to occur in accordance with adopted plans and regulations. Therefore, cumulative aesthetic impacts would be less than significant.

Agriculture and Forestry Resources

Development of the Project in combination with the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

Air Quality

AQMP Consistency

Cumulative development can affect implementation of the 2012 AQMP. The 2012 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2012 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Because the Project site is classified as “Limited Manufacturing” in the Community Plan, the RTP/SCS’ assumptions about growth in the City did not assume housing and population growth on this site. As such, the Project could conflict with the growth assumptions in the regional air quality attainment plan. However, the City of Los Angeles shall coordinate with the Southern California Association of Governments to update the RTP/SCS growth assumptions for the Project Site and other conversions of industrial land to residential land so air quality impacts from the proposed development are reflected in

the regional AQMP. This would ensure that the air quality impacts of residential development on the Project site will be accommodated in the region's emissions inventory for the RTP/SCS and AQMP.

As discussed in the Air Quality and Utilities and Service Systems sections of this IS/MND, the Project is consistent with SCAG's growth projections which are based on macroeconomic data and socioeconomic variables independent of parcel-level land use designation and zoning. Therefore, the Project would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2012 AQMP would be less than significant.

Construction and Operational Emissions

Cumulative air quality impacts from construction and operation of the Project, based on SCAQMD guidelines, are analyzed in a manner similar to Project-specific air quality impacts. The SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, according to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Thus, as discussed in Question 3(c) above, because the construction-related and operational daily emissions associated with Project would not exceed the SCAQMD's recommended thresholds (with mitigation), these emissions associated with the Project would not be cumulatively considerable. Therefore, cumulative air quality impacts would be less than significant.

Odor Impacts

With respect to odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the related projects and the Project's long-term operations phase. Thus, cumulative odor impacts would be less than significant.

Biological Resources

The Project would have no impact upon biological resources. Development of the Project would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance. Thus, cumulative impacts to biological resources would be considered less than significant.

Cultural Resources

Impacts to cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Project's impacts to cultural resources concluded that the Project would have no significant impacts with respect to cultural resources following appropriate mitigation for archaeology, paleontology, and human remains. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

Geology and Soils

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any of the related projects. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of the mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

Greenhouse Gas Emissions

The Project emissions represent a 23 percent reduction in CO₂e emissions from a Business-As-Usual scenario and are consistent with the State's AB 32 Scoping Plan objectives for reducing community-based emissions. The Project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

Hazards and Hazardous Materials

Hazards are site-specific and there is little, if any, cumulative hazardous relationship between the Project and any of the related projects. Similar to the Project, potential impacts related to hazards would be assessed on a case-by-case basis and, if necessary, the applicants of the related projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's hazards and hazardous materials impact concluded that, through the implementation of the mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative hazard and hazardous materials impacts would be less than significant.

Hydrology and Water Quality

The Project Site and the surrounding areas are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected

from the Project Site and the related projects, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the Low Impact Development Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing $\frac{3}{4}$ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

Land Use

None of the related projects would physically divide an established community or conflict with a habitat conservation plan because they are all in urban areas. There are no City or County significant ecological areas in the related projects.²¹⁷ Therefore, cumulative land use impacts would be less than significant.

Furthermore, the Project would not make a cumulatively considerable contribution to a cumulatively significant land use inconsistency, and cumulative impacts would be less than significant. As reflected in Table 3.16-8, there are 54 related projects in the Project Site vicinity. The related projects are generally located in commercial or residential land use designations and zones, and thus do not implicate industrial policies as articulated in the Framework Element, Hollywood Community Plan or Industrial Land Use Policy. Only related projects Nos. 1, 5, 6, 15, 21, 35, 37 and 54 are located within industrial land use designations and zones, including related projects requesting General Plan Amendments to or from industrial designations. Only two related projects – Nos. 15 and 21 –remove the industrial designation of 2.5 and 5.9-acre properties, respectively, for residential and retail development. Related project No. 5 actually expands the inventory of industrially-designated land by redesignating 0.5 acres of residential land to industrial designation for office use in conjunction with a film studio. Combined with the Project's 1.15 acres, all related projects would result in a redesignation of approximately 9.05 acres of industrially-designated land for residential and commercial use. However, the Industrial Land Use Policy identified a total of 262 acres of industrially-designated land bounded by Vine Street, Melrose Avenue, Formosa Avenue and Lexington Avenue. The 9.05-acre cumulative loss of industrially-designated land represents only a 3.5% reduction in industrial acreage. Additionally, all related and future projects will comply with the City's zoning code. General Plan Amendments to redesignate industrial land will be legally required to make findings demonstrating consistency with the Framework Element, the applicable Community Plan and the Industrial Land Use Policy. Thus, the cumulative impacts of the Project in conjunction with all related projects in industrial zones are not significant.

²¹⁷ *Navigate LA, City of Los Angeles, Bureau of Engineering, Significant Ecological Areas layer: <http://navigatela.lacity.org/index01.cfm>*

Additionally, rather than removing prime industrial land suitable for traditional light-industrial purposes, the Project's contribution to the cumulative impact is limited to the removal of marginal industrial uses lining a predominantly commercial and residential corridor, La Brea Avenue. No further zone changes or General Plan Amendments have been proposed for the remaining industrially-zoned properties fronting La Brea or west of it. Therefore, such future projects are merely speculative at this time and are not considered related projects for cumulative impact analysis. Furthermore, the baseline use of industrially-zoned properties fronting La Brea is predominantly office and retail. Future redesignations of these properties will analyze changes in industrial employment and viability compared to baseline conditions which do not involve industrial use. Thus, the Project's contribution is not cumulatively considerable.

Finally, the City's threshold of significance analyzes inconsistency only with respect to policies adopted to mitigate or avoid environmental impacts. Industrial preservation policies in the Framework Element, Hollywood Community Plan and the Industrial Land Use Policy were adopted for economic, not environmental reasons. Thus, a cumulative inconsistency cannot result in a finding of significance.

Mineral Resources

Development of the Project in combination with the related projects would not result in the loss of availability of mineral resources. The Project Site and the surrounding area are highly urbanized area and do not include any MRZ zones. Therefore, no cumulative impact would occur.

Noise

The related projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. Construction-period noise for the Project and each related project (that has not yet been built) would be localized in nature. None of the related projects are in close enough proximity to the Project Site to cause cumulative construction or stationary noise or vibration impacts. Related Project No. 15 is already under construction and expected to be occupied when the Project would be under construction. The other nearby related projects are Nos. 37 and 54. Any construction noise from either site, were it to occur concurrently with the Project, would be attenuated by the distance across La Brea Avenue and the existing building on No. 37, which is an existing building that has been renovated/expanded. In addition, each of the related projects would be required to comply with the City's noise ordinance, as well as implement any mitigation measures that may be prescribed pursuant to CEQA. With respect to cumulative traffic noise impacts, it should be noted that the Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Project Traffic Impact Study. Based on the Project's estimated trip generation, the Project plus future cumulative baseline conditions would not have the potential to create a significant cumulative impact. As such, the Project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with construction noise would be less than significant.

Population and Housing

The related projects would introduce additional residential, commercial/retail/restaurant, office, school, and other related uses to the City of Los Angeles and City of West Hollywood. Any residential related projects would result in direct population growth. The related projects that involve residential developments would cumulatively contribute approximately 5,894 residential dwelling units to the area, generating approximately 16,562 new residents (a conservative assumption including West Hollywood and adjacent communities). The Project includes 169 units and would generate approximately 475 persons. The Project's contribution to any impact is minimal because it represents only 2.8% of the dwelling units and population proposed by all related projects. The net increase of approximately 30 employees is not cumulatively considerable as there are no thresholds for employee impacts. The Project would not displace any residents. The City is expected to increase its population by approximately 166,403 persons from 2012-2020. The RTP/SCS growth assumptions for the Project Site and other General Plan amendments can be coordinated by the City of Los Angeles when new data sets are requested. This would ensure that the land uses changes (including density increases) will be accommodated in the region's inventory for the RTP/SCS. The Project and related projects would not exceed this projection. Therefore, the Project's cumulative impacts to population and housing would be less than significant.

Public Services

Fire

The Project, in combination with the related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and related projects would contribute. Similar to the Project, each of the related projects in the City of Los Angeles would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. The related projects in West Hollywood would be served by the Los Angeles County Fire Department, through Station No. 7 and No. 8. Nevertheless, the development on any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to fire protection services impacts, and, as such cumulative impacts on fire protection would be less than significant.

Police

The Project, in combination with the related projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. The related projects in West Hollywood would be served by the Los Angeles County Sheriff's Department, through the West Hollywood Station. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to police protection services impacts, and cumulative impacts on police protection would be less than significant.

Schools

The Project, in combination with the related projects is expected to result in a cumulative increase in the demand for school services. Development of the related projects is projected to generate approximately 5,894 new residential dwelling units to the area, which will generate additional demands upon school services. These related projects would have the potential to generate students that would attend the same schools as the Project. In addition, three of the related projects involve the development of facilities for 359 students (daycare, kindergarten, tutoring, and school). However, each of the new housing units, commercial, and industrial uses would be responsible for paying mandatory school fees to mitigate the increased demands for school services. Cumulative impacts on schools would be less than significant.

Parks and Recreation

Development of the Project in conjunction with the related projects could result in an increase in permanent residents residing in the Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects is required to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the

Project would not make a cumulatively considerable impact to parks and recreational facilities and cumulative impacts would be less than significant.

Library

Development of the related projects would likely generate additional demands upon library services. The related projects in West Hollywood would be served by the Los Angeles County Public Library, through the West Hollywood Branch. However, there are no planned expansions or new libraries by the LAPL that would be considered a significant impact. Therefore, the cumulative impacts related to library facilities would be less than significant.

Traffic

Development of the Project in conjunction with the related projects would result in an increase in average daily vehicle trips and peak hour vehicle trips. The methodology for traffic analysis included both an individual project level analysis (existing With Project scenario) and a cumulative impact analysis (Future baseline w/Project scenario). This cumulative future includes the related projects. The future (2018) with Project analysis shows no significant impact to any of the study intersections or CMP intersections or freeways. Therefore, the Project’s cumulative impact is considered less than significant.

Utilities

Development of the Project, in conjunction with cumulative growth throughout the City of Los Angeles (including the related projects), would further increase the generation of wastewater, demand for potable water within the City, and increase regional demands on landfill capacity.

Wastewater

As shown on Table 3.18-1, Cumulative Estimated Wastewater Generation, it is estimated the Related Projects will generate a net total of approximately 1,624,859 gallons per day (gpd) (or 1.62 mgd) of wastewater. The Project represents 1.3 percent of the cumulative total. The HTP has adequate capacity (88 mgd) to accommodate the Cumulative total. Therefore a less than significant impact would occur

**Table 3.18-1
Cumulative Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Residential	5,894 units	150 gallons / unit	884,100
Health Club	104,992 sf	650 gallons / 1,000 sf	68,245
Office	3,276,574 sf	120 gallons / 1,000 sf	393,189
School	359 students	11 gallons / student	3,949
Retail	736,175 sf	50 gallons / 1,000 sf	36,809

**Table 3.18-1
Cumulative Estimated Wastewater Generation**

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Hotel	1,402 rooms	120 gallons / room	168,240
Restaurant	97,943 sf	300 gallons / 1,000 sf	29,383
Bar/Lounge	25,894 sf	720 gallons / 1,000 sf	18,644
Storage	24,900 sf	30 gallons /1,000 sf	747
Related Projects			1,603,306
Proposed Project			21,553
Cumulative (Related + Project)			1,624,859

Note: sf = square feet; gpd = gallons per day
Rates: Sewage Generation Factor, effective date April 6, 2012: <http://lacitysan.org/fmd/pdf/sfcfeerates.pdf>
Residential units include a variety of types and unknown number of bedrooms. This analysis assumes an average of two-bedroom units, which will balance the studio and 1-bedroom units with larger units.
Since some of the related projects do not contain enough details to determine specific types within a given land use category, the rates selected here include the largest generator to show a most conservative impact.
Retail includes two rates (one for less than 100,000 sf and one for greater than 100,000 sf). This analysis includes the larger rate for a greater generator to show a most conservative impact.
Table: CAJA Environmental Services, November 2014.

Water

As shown on Table 3.18-2, Cumulative Estimated Water Demand, it is estimated the related projects and the Project will demand a net total of approximately 1,989,474 gallons per day (gpd) (or 1.99 mgd) of water. The Project represents 1.3 percent of the cumulative total. The LAAFP has adequate capacity (between 50 and 150 mgd, during summer and non-summer months, respectively) to accommodate the Cumulative total. Therefore a less than significant impact would occur

**Table 3.18-2
Cumulative Estimated Water Demand**

Land Use	Size	Water Demand Rates	Total (gpd)
Residential	5,894 units	177 gallons / unit	1,043,238
Health Club	104,992 sf	832 gallons / 1,000 sf	87,353
Office	3,276,574 sf	153.6 gallons / 1,000 sf	503,282
School	359 students	14 gallons / student	5,026
Retail	736,175 sf	64 gallons / 1,000 sf	47,115
Hotel	1,402 rooms	153.6 gallons / room	215,347

**Table 3.18-2
Cumulative Estimated Water Demand**

Land Use	Size	Water Demand Rates	Total (gpd)
Restaurant	97,943 sf	384 gallons / 1,000 sf	37,610
Bar/Lounge	25,894 sf	922 gallons / 1,000 sf	23,874
Storage	24,900 sf	38 gallons /1,000 sf	946
Related Projects			1,963,791
Proposed Project			25,683
Cumulative (Related + Project)			1,989,474

*Note: sf = square feet; gpd = gallons per day
Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.
Rates: Sewage Generation Factor, effective date April 6, 2012: <http://lacitysan.org/fmd/pdf/sfcfeerates.pdf>
Residential units include a variety of types and unknown number of bedrooms. This analysis assumes an average of two-bedroom units, which will balance the studio and 1-bedroom units with larger units.
Since some of the related projects do not contain enough details to determine specific types within a given land use category, the rates selected here include the largest generator to show a most conservative impact.
Retail includes two rates (one for less than 100,000 sf and one for greater than 100,000 sf). This analysis includes the larger rate for a greater generator to show a most conservative impact.
Table: CAJA Environmental Services, November 2014.*

Solid Waste

As shown on Table 3.18-3, Cumulative Estimated Solid Waste Generation, it is estimated the related projects and the Project will generate a net total of approximately 107,279 pounds per day of solid waste (or 53,6 tons). The Project represents approximately 1.9 percent of the cumulative total. The Sunshine Canyon landfill has adequate capacity (and currently accepts 9,000 tpd on weekdays and 3,000 tpd on Saturday) to accommodate the Cumulative total. Therefore a less than significant impact would occur

**Table 3.18-3
Cumulative Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Rates	Total (pounds)
Residential	5,894 units	12.23 pounds / unit	72,084
Health Club	104,992 sf	31.2 pounds / 1,000 sf	3,276
Office	3,276,574 sf	6 pounds / 1,000 sf	19,659
School	359 students	0.5 pounds / student	180
Retail	736,175 sf	5 pounds / 1,000 sf	3,681

**Table 3.18-3
Cumulative Estimated Solid Waste Generation**

Land Use	Size	Solid Waste Rates	Total (pounds)
Hotel	1,402 rooms	4 pounds / room	5,608
Restaurant	97,943 sf	5 pounds / 1,000 sf	490
Bar/Lounge	25,894 sf	5 pounds / 1,000 sf	129
Storage	24,900 sf	5 pounds / 1,000 sf	125
Related Projects			105,232
Proposed Project			2,047
Cumulative (Related + Project)			107,279
<i>Note: sf = square feet</i>			
<i>Rates: CalRecycle Estimated Solid Waste Generation Rates:</i>			
<i>http://www.calrecycle.ca.gov/wastechar/wastegenrates/</i>			
<i>Table: CAJA Environmental Services, November 2014.</i>			

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2010 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2035. Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant with implementation of provided mitigation measures (where applicable). These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the related projects in the City. In addition, several of the related projects would be subject to SB 610, which requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand. Ultimately, the wastewater and water facilities (HTP and LAAFP) and the Puente Hills MRF, Sunshine Canyon landfill, and Mesquite landfill have adequate capacity to accommodate the project and related projects along with the general growth within the City. The Project’s contribution to cumulative wastewater, water, and solid waste impacts will not be cumulatively considerable and cumulative impacts would be less than significant.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.

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