FORM GEN. 160A (Rev. 1/82)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

6421 Selma Ave
DOT Case No. CEN 16-44348

Date: June 11, 2017

To: Nicholas Hendricks, City Planner
Department of City Planning

From: Wes Pringle, Transportation Engineer
Department of Transportation

Subject: **TRANSPORTATION IMPACT ASSESSMENT FOR THE SELMA-WILCOX HOTEL MIXED-USE PROJECT LOCATED AT 6421 SELMA AVENUE (ENV-2016-2602-EAF/ CPC-2016-2601-VZC-MCUP-ZV-SPR)**

The Department of Transportation (DOT) has reviewed the transportation impact study, dated May 2017, prepared by Overland Traffic Consultants, Inc., for the Selma-Wilcox Hotel Project located at 6421 Selma Avenue. In order to evaluate the effects of the project's traffic on the available transportation infrastructure, the significance of the project's traffic impacts is measured in terms of change to the volume-to-capacity (V/C) ratio between the "future no project" and the "future with project" scenarios. This change in the V/C ratio is compared to DOT's established threshold standards to assess the project-related traffic impacts. Based on DOT's current traffic impact criteria[1], the transportation study included the detailed analysis of 10 signalized intersections and determined that two of these study intersections would be significantly impacted by project-related traffic. This report summarizes the results of the transportation analysis (see **Attachment 1**), which accounted for other known development projects in evaluating potential cumulative impacts and adequately evaluated the project's traffic impacts on the surrounding community.

DISCUSSION AND FINDINGS

A. Project Description

The project proposes to construct a mixed-use hotel development with a 114-room hotel, 1,809 square foot ground floor restaurant, and 5,041 square foot rooftop restaurant/bar. The project site has recently been improved with a new subterranean garage, restaurant and retail space. The proposed hotel with amenities will be constructed with the ground floor restaurant replacing a portion of the retail space, and the remaining over the two recently constructed elements.

Project parking is provided on-site with three below grade parking levels, with access from a full access driveway off of Wilcox Avenue. A valet service will be provided to hotel and restaurant guests. The project will also provide on-site short term and long term bicycle parking spaces. The project is expected to be completed by the end of 2020.

[1] Per the DOT Traffic Study Policies and Procedures, a significant impact is identified as an increase in the Critical Movement Analysis (CMA) value, due to project-related traffic, of 0.01 or more when the final ("with project") Level of Service (LOS) is LOS E or F; an increase of 0.020 or more when the final LOS is LOS D; or an increase of 0.040 or more when the final LOS is LOS C.

Exhibit D

B. Trip Generation

The project is estimated to generate 1,227 daily trips, a net increase of 70 trips in the a.m. peak hour, and a net increase of 100 trips in the p.m. peak. The trip generation estimates are based on formulas published by the Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition, 2012. A copy of the trip generation table can be found in **Attachment 2**.

C. Freeway Analysis

The transportation impact analysis included a freeway impact screening analysis that was executed between Caltrans and DOT in December 2015 to determine if additional evaluation of freeway mainline and ramp segments was necessary. According to this analysis, the project would not meet the freeway mainline impact criteria, but would exceed the freeway off-ramp criteria at two locations. Exceeding one of the four screening criteria would require the applicant to work directly with Caltrans to prepare more detailed freeway analyses, and the applicant has prepared the necessary analysis to Caltrans.

D. Traffic Impacts

The transportation impact study presented an analysis for the proposed project and supplemental traffic analyses for two scenarios:

1. Proposed project development assuming **Original Baseline**, representing the original four residential units, 4,893 square feet of vacant retail, 3,174 square feet of restaurant, and 1,650 square feet of piano bar
2. Proposed project development assuming **Current Baseline**, representing the approved and recently constructed 20,624 square foot restaurant and 6,000 square feet retail.

The study determined that the project would result in significant traffic impacts during PM peak hours at the following intersections before mitigation based on a project build-out year of 2020:

1. Hollywood Boulevard & Wilcox Avenue (**Original and Current Baseline)**
2. Selma Avenue & Wilcox Avenue **(Current Baseline)**

In consideration of the City's Vision Zero initiative and the Mobility Plan 2035, the transportation study proposed a transportation mitigation program focused on reducing project-related trips and promotion of other travel modes. The transportation mitigation program fully mitigates the project's significant impacts during the PM peak commute hours at the above intersections (see **Attachment 3)**.

PROJECT REQUIREMENTS

A. Transportation Mitigation Program

Consistent with City policies on sustainability and smart growth and with DOT's trip reduction and multi-modal transportation goals, the project's mitigation focuses on developing a trip reduction program and on solutions that promote other modes of travel. The traffic mitigation program includes the following improvements:

1. **Transportation Demand Management (TDM) Program**

The purpose of a TDM plan is to reduce the use of single occupant vehicles (SOV) by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. A TDM plan should include design features, transportation services, education, and incentives intended to reduce the amount of SOV during commute hours. Through strategic building design and orientation, this project can facilitate access to transit, can provide a pedestrian-friendly environment, can promote non-automobile travel and can support the goals of a trip-reduction program.

A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The TDM program should include, but not be limited to, the following strategies:

- An on-site Transportation Information Center;
- Preferential rideshare loading/unloading or parking location;
- Convenient parking and facilities for bicycle riders;
- Guaranteed ride home programs for employees;
- Allowance for flexible and alternative work schedules;
- Administrative support for the formation of carpools/vanpools;
- Promotion of transit, walk, or bike to work events;
- Project design elements to ensure a bicycle, transit, and pedestrian friendly environment;
- Unbundled parking from housing cost;
- Parking cash-out programs for Project and uses as appropriate;
- A Covenant and Agreement to ensure that the TDM program will be maintained.

The following improvements proposed by the project as part its transit and mobility improvement program should be part of the TDM program:

- Provide guest assistance on arrival and departure to find options to personal or rented vehicles to access the site
- If feasible, improve the existing bus stops surrounding the project site
- Provide an on-site kiosk with options for ridesharing, bus routes, and bike routes
- Provide transit options and bike information for hotel guests upon check in
- Provide an on-site TDM manager to assist hotel guests navigate the alternative modes of transportation options
- Provide access pass and transit pass reductions for employees
- Contribute a one-time fixed fee contribution of **$50,000** to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the vicinity of the project.
- Provide bicycle spaces and amenities to encourage cycling as an alternative mode of transportation

- Provide bicycle sharing service for guests and employee use
- Provide amenities to encourage guests to spend time on-site

B. Construction Impacts

DOT recommends that a construction work site traffic control plan be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction-related traffic be restricted to off-peak hours.

C. Highway Dedication and Street Widening Requirements

On September 7, 2016, the City Council adopted the Mobility Plan 2035 which is the new Mobility Element of the General Plan. A key feature of the updated plan is to revise street standards in an effort to provide a more enhanced balance between traffic flow and other important street functions including transit routes and stops, pedestrian environments, bicycle routes, building design and site access, etc. Per the new Mobility Element, **Wilcox Avenue** is designated as a Modified Avenue III, which would require a 20-foot half-width roadway within a 35-foot half-width right-of-way. **Selma Avenue** is designated as a Local Street Standard, which would require 18-foot half-width roadway within a 30-foot half-width right-of-way. The applicant should check with BOE's Land Development Group to determine the specific highway dedication, street widening and/or sidewalk requirements for this project.

D. Parking Requirement

The project would provide the minimum code-required parking spaces for vehicles and bicycles. Project parking is provided on-site with three below grade parking levels, with access from a full access driveway off of Wilcox Avenue. A valet service will be provided to hotel and restaurant guests. The project will also provide on-site short term and long term bicycle parking spaces. The developer should check with the Department of Building and Safety on the number of parking spaces needed.

E. Project Access and Circulation

The proposed site plan illustrated in **Attachment 4** is acceptable to DOT; however, review of the study does not constitute approval of internal circulation schemes and driveway dimensions. Those require separate review and approval and should be coordinated with DOT's Citywide Planning Coordination Section 201 N. Figueroa Street, 5th Floor, Room 550, at (213) 482-7024. Any changes to the project's site access, circulation scheme, or loading/unloading area after issuance of this report would require separate review and approval and should be coordinated as well. In order to minimize potential building design changes, the applicant should contact DOT for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans.

F. Development Review Fees

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT for permit issuance activities was adopted by the Los

Angeles City Council in 2009 and updated in 2014. This ordinance identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

If you have any questions, please contact Johnathan Yu of my staff at (213)-972-4993.

Attachments

J:\Letters\2017\CEN16-44348_6421 Selma_Tao Hotel.docx

c: Chris Robertson, Council District No. 13
Carl Mills, BOE Development Services
Jeannie Shen, Hollywood Wilshire District Office, DOT
Taimour Tanavoli, Case Management Office, DOT
Liz Fleming, Overland Traffic Consultants, Inc.

ATTACHMENT 1
Summary of Volume to Capacity Ratios (V/C) and Level of Service (LOS)

Table 7a
Traffic Conditions for Existing with Original Baseline + Project

No.	Intersection	Peak Hour	Existing		Existing +Project			Significant Impact
			CMA	LOS	CMA	LOS	Impact	
1	Highland Av &	AM	0.477	A	0.485	A	+ 0.008	NO
	Selma Av	PM	0.424	A	0.434	A	+ 0.010	NO
2	Highland Av &	AM	0.880	D	0.881	D	+ 0.001	NO
	Sunset Bl	PM	0.756	C	0.758	C	+ 0.002	NO
3	Hollywood Bl &	AM	0.744	C	0.749	C	+ 0.005	NO
	Wilcox Av	PM	0.565	A	0.574	A	+ 0.009	NO
4	Selma Av &	AM	0.297	A	0.308	A	+ 0.011	NO
	Wilcox Av	PM	0.382	A	0.413	A	+ 0.031	NO
5	Sunset Bl &	AM	0.547	A	0.555	A	+ 0.008	NO
	Wilcox Av	PM	0.579	A	0.581	A	+ 0.002	NO
6	Cahuenga Bl &	AM	0.881	D	0.885	D	+ 0.004	NO
	Hollywood Bl	PM	0.661	B	0.665	B	+ 0.004	NO
7	Cahuenga Bl &	AM	0.411	A	0.415	A	+ 0.004	NO
	Selma Av	PM	0.421	A	0.429	A	+ 0.008	NO
8	Cahuenga Bl &	AM	0.820	D	0.824	D	+ 0.004	NO
	Sunset Bl	PM	0.730	C	0.735	C	+ 0.005	NO
9	Hollywood Bl &	AM	0.776	C	0.779	C	+ 0.003	NO
	Vine Street	PM	0.743	C	0.745	C	+ 0.002	NO
10	Sunset Bl &	AM	0.827	D	0.829	D	+ 0.002	NO
	Vine Street	PM	0.874	D	0.875	D	+ 0.001	NO

Table 7b
Traffic Conditions for Existing with Current Baseline + Project

No.	Intersection	Peak Hour	Existing		Existing +Project			Significant Impact
			CMA	LOS	CMA	LOS	Impact	
1	Highland Av &	AM	0.479	A	0.486	A	+ 0.007	NO
	Selma Av	PM	0.432	A	0.442	A	+ 0.010	NO
2	Highland Av &	AM	0.881	D	0.882	D	+ 0.001	NO
	Sunset Bl	PM	0.758	C	0.760	C	+ 0.002	NO
3	Hollywood Bl &	AM	0.745	C	0.750	C	+ 0.005	NO
	Wilcox Av	PM	0.582	A	0.591	A	+ 0.009	NO
4	Selma Av &	AM	0.299	A	0.031	A	+ -0.268	NO
	Wilcox Av	PM	0.423	A	0.455	A	+ 0.032	NO
5	Sunset Bl &	AM	0.549	A	0.557	A	+ 0.008	NO
	Wilcox Av	PM	0.581	A	0.583	A	+ 0.002	NO
6	Cahuenga Bl &	AM	0.882	D	0.886	D	+ 0.004	NO
	Hollywood Bl	PM	0.669	B	0.673	B	+ 0.004	NO
7	Cahuenga Bl &	AM	0.413	A	0.417	A	+ 0.004	NO
	Selma Av	PM	0.433	A	0.440	A	+ 0.007	NO
8	Cahuenga Bl &	AM	0.821	D	0.825	D	+ 0.004	NO
	Sunset Bl	PM	0.736	C	0.741	C	+ 0.005	NO
9	Hollywood Bl &	AM	0.777	C	0.779	C	+ 0.002	NO
	Vine Street	PM	0.745	C	0.747	C	+ 0.002	NO
10	Sunset Bl &	AM	0.827	D	0.830	D	+ 0.003	NO
	Vine Street	PM	0.875	D	0.877	D	+ 0.002	NO

Table 9a
Future (2020) Traffic Conditions
Without Project using Original Baseline

No.	Intersection	Peak Hour	Existing		Future (2020) Without Project		
			CMA	LOS	CMA	LOS	Growth
1	Highland Av &	AM	0.477	A	0.760	C	+ 0.283
	Selma Av	PM	0.424	A	0.839	D	+ 0.415
2	Highland Av &	AM	0.880	D	1.014	F	+ 0.134
	Sunset Bl	PM	0.756	C	0.955	E	+ 0.199
3	Hollywood Bl &	AM	0.744	C	0.947	E	+ 0.203
	Wilcox Av	PM	0.565	A	0.903	E	+ 0.338
4	Selma Av &	AM	0.297	A	0.507	A	+ 0.210
	Wilcox Av	PM	0.382	A	0.729	C	+ 0.347
5	Sunset Bl &	AM	0.547	A	0.653	B	+ 0.106
	Wilcox Av	PM	0.579	A	0.770	C	+ 0.191
6	Cahuenga Bl &	AM	0.881	D	1.100	F	+ 0.219
	Hollywood Bl	PM	0.661	B	0.877	D	+ 0.216
7	Cahuenga Bl &	AM	0.411	A	0.641	B	+ 0.230
	Selma Av	PM	0.421	A	0.649	B	+ 0.228
8	Cahuenga Bl &	AM	0.820	D	0.990	E	+ 0.170
	Sunset Bl	PM	0.730	C	0.930	E	+ 0.200
9	Hollywood Bl &	AM	0.776	C	0.933	E	+ 0.157
	Vine Street	PM	0.743	C	0.943	E	+ 0.200
10	Sunset Bl &	AM	0.827	D	1.003	F	+ 0.176
	Vine Street	PM	0.874	D	1.081	F	+ 0.207

Table 9b
Future (2020) Traffic Conditions
Without Project using Current Baseline

No.	Intersection	Peak Hour	Existing CMA	Existing LOS	Future (2020) Without Project CMA	Future (2020) Without Project LOS	Growth
1	Highland Av &	AM	0.479	A	0.761	C	+ 0.282
	Selma Av	PM	0.432	A	0.847	D	+ 0.415
2	Highland Av &	AM	0.881	D	1.015	F	+ 0.134
	Sunset Bl	PM	0.758	C	0.958	E	+ 0.200
3	Hollywood Bl &	AM	0.745	C	0.949	E	+ 0.204
	Wilcox Av	PM	0.582	A	0.921	E	+ 0.339
4	Selma Av &	AM	0.299	A	0.511	A	+ 0.212
	Wilcox Av	PM	0.423	A	0.771	C	+ 0.348
5	Sunset Bl &	AM	0.549	A	0.655	B	+ 0.106
	Wilcox Av	PM	0.581	A	0.773	C	+ 0.192
6	Cahuenga Bl &	AM	0.882	D	1.101	F	+ 0.219
	Hollywood Bl	PM	0.669	B	0.885	D	+ 0.216
7	Cahuenga Bl &	AM	0.413	A	0.643	B	+ 0.230
	Selma Av	PM	0.433	A	0.662	B	+ 0.229
8	Cahuenga Bl &	AM	0.821	D	0.992	E	+ 0.171
	Sunset Bl	PM	0.736	C	0.936	E	+ 0.200
9	Hollywood Bl &	AM	0.777	C	0.933	E	+ 0.156
	Vine Street	PM	0.745	C	0.945	E	+ 0.200
10	Sunset Bl &	AM	0.827	D	1.004	F	+ 0.177
	Vine Street	PM	0.875	D	1.083	F	+ 0.208

ATTACHMENT 2
Project Trip Generation Estimates

Table 2
Estimated Project Traffic Generation

ITE Code	Description	Size	Daily	AM Peak Hour Total	AM Peak Hour In	AM Peak Hour Out	PM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out
	Proposed Project								
310	Hotel	114 Room	931	60	36	24	68	35	33
932	Ground Floor Restaurant	1,809 sf	230	20	11	9	18	11	7
	Internal Trips	50%	(115)	(10)	(5)	(5)	(9)	(5)	(4)
	Pass-By	20%	(23)	(2)	(1)	(1)	(2)	(1)	(1)
	Subtotal Lobby Restaurant/Bar		92	8	5	3	7	5	2
931/925	Roof top Restaurant/Bar	5,041 sf	453	4	3	1	57	37	20
	Internal Trips	50%	(227)	(2)	(1)	(1)	(29)	(19)	(10)
	Pass-By	10%	(23)	(0)	(0)	(0)	(3)	(2)	(1)
	Subtotal Rooftop Restaurant/Bar		204	2	2	0	26	17	9
	NET Proposed Project		**1,227**	**70**	**43**	**27**	**100**	**56**	**44**

ATTACHMENT 3
V/C ratio and LOS Summary with Mitigation

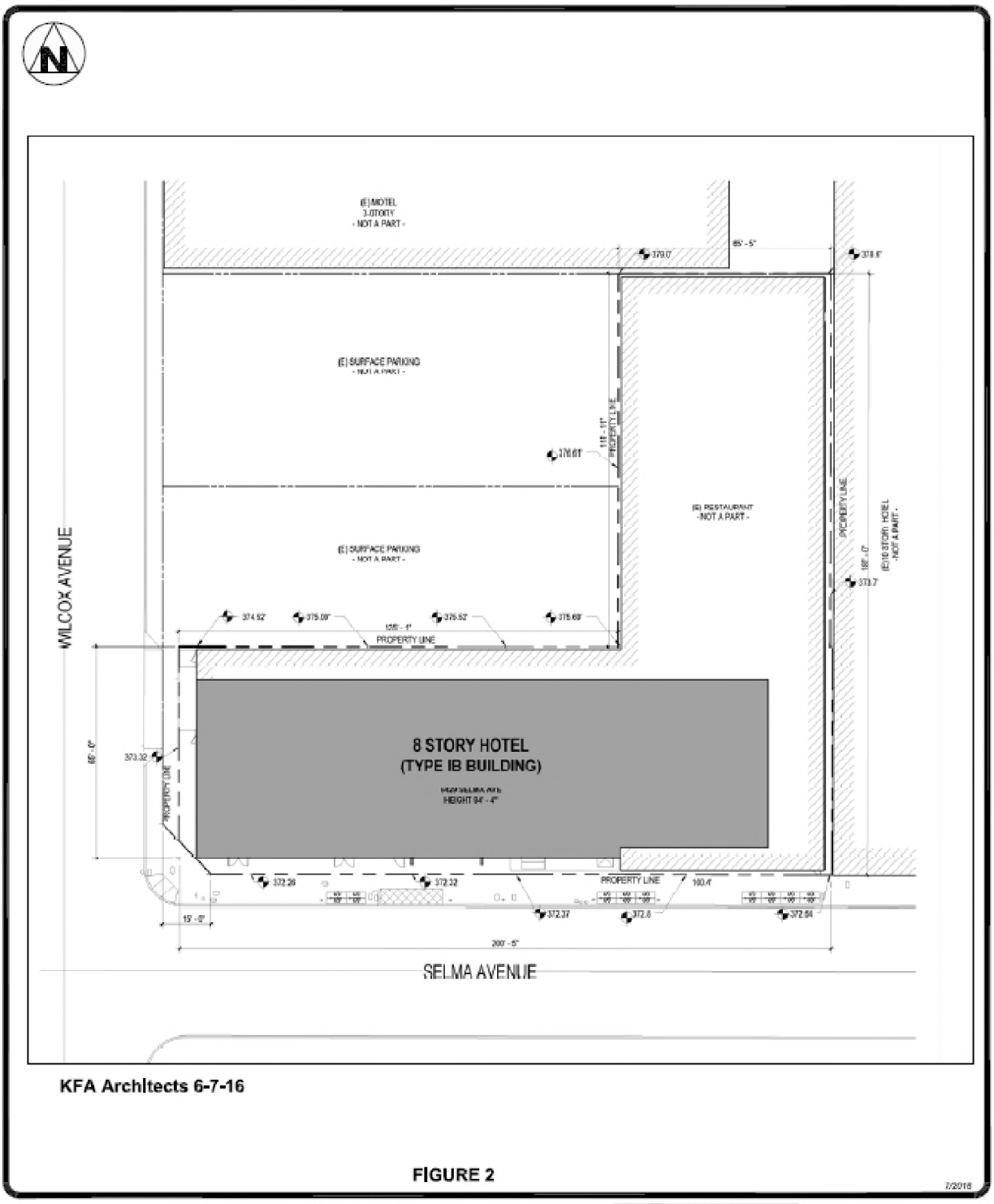
Table 15a
CMA Summary with Mitigation
Original Baseline

No.	Intersection	Peak Hour	Future (2020) Without Project		Future (2020) With Project			Significant Impact	Future (2020) With Project + MITIGATION			Significant Impact
			CMA	LOS	CMA	LOS	IMPACT		CMA	LOS	IMPACT	
3	Hollywood Bl &	AM	0.947	E	0.952	E	+ 0.005	NO	N/A			
	Wilcox Av	PM	0.903	E	0.913	E	+ 0.010	YES	0.912	E	+ 0.009	NO

Table 15b
CMA Summary with Mitigation
Current Baseline

No.	Intersection	Peak Hour	Future (2020) Without Project		Future (2020) With Project			Significant Impact	Future (2020) With Project + MITIGATION			Significant Impact
			CMA	LOS	CMA	LOS	IMPACT		CMA	LOS	IMPACT	
3	Hollywood Bl &	AM	0.949	E	0.953	E	+ 0.004	NO	N/A			
	Wilcox Av	PM	0.921	E	0.931	E	+ 0.010	YES	0.930	E	+ 0.009	NO
4	Selma Av &	AM	0.511	A	0.522	A	+ 0.011	NO	N/A			
	Wilcox Av	PM	0.771	C	0.803	D	+ 0.032	YES	0.799	C	+ 0.028	NO

ATTACHMENT 4
Project Site plan



KFA Architects 6-7-16

FIGURE 2

7/2016

PROJECT SITE PLAN (First Level)

Overland Traffic Consultants, Inc.
952 Manhattan Beach Bl, #100, Manhattan Beach, CA 90266
(310) 545-1235 phone, liz@overlandtraffic.com

CITY OF LOS ANGELES

DEPARTMENT OF CITY PLANNING

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

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

ENV-2016-2602-MND
CPC-2016-2601-VZC-HD-CUB-SPR
Project Title: Selma Wilcox Hotel Project

Council District No. 13

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

Project Addresses: 6421-6429 W. Selma Avenue and 1600-1604 N. Wilcox Avenue, Los Angeles, California 90028

Project Description: The Project would maintain an existing 20,624 square-foot restaurant (existing restaurant) and the construction of a new 1,939 square-foot ground floor restaurant (new restaurant) and a 114 guestroom hotel (hotel). The Proposed Project would include a change of use of a previously proposed 6,000 square-foot ground floor retail space into the proposed 1,939 square-foot restaurant and the lobby, bar, and other accessory uses of the proposed 114 guestroom hotel. The new restaurant proposes to have a maximum of 100 seats, 60 indoor and 40 outdoor seats. The hotel proposes to have a lobby bar on the ground floor with 48 seats and the rooftop would include a pool, amenity deck, a rooftop bar with 73 seats, and other accessory uses. The Project proposes to maintain the previously proposed three-levels of subterranean parking, which would be accessible from Wilcox Avenue.

The IS/MND proposes to analyze the Project utilizing the following two baselines, referenced as the Original Baseline and Current Baseline. The Original Baseline will describe the environmental conditions that originally existed at the time of submittal of Case No. ENV-2015-2672-MND. The MND evaluated the demolition of existing structures and the proposed construction of a 20,624 square-foot restaurant, 6,000 square feet of retail, and three levels of subterranean parking (Approved Project).[1] The Current Baseline will describe existing environmental conditions, which includes the 20,624 square feet of restaurant, partial construction of three-levels of subterranean parking, and an excavated area. The Project would be analyzed against the two baselines described above to measure the Project's impacts against the physical conditions that existed prior to the Original Baseline and the conditions that exist today, the Current Baseline.

The Current Baseline restaurant (20,624 square feet) would remain while the proposed 6,000 square feet of retail space would be renovated and become the new ground floor restaurant (1,939 square feet) and the hotel lobby area and corridors. The Proposed Project would be comprised of a ground floor restaurant of approximately 1,939 square feet with 100 seats (60 indoor seats and 40 outdoor seats), and a 114 guestroom hotel with a lobby bar of approximately 819 square feet (with 48 seats), rooftop pool and amenity deck with rooftop bar of approximately 5,807 square feet (with 73 seats), and three levels of subterranean parking. The required 86 parking spaces would be provided in the subterranean parking structure (50 spaces) and off-site (36 spaces) at 1541 Wilcox Avenue.

The Project would be analyzed against the two baselines described above. This way, the Project impacts would be measured against the physical conditions that existed prior to the CUB Approval (Original Baseline), as well as the physical conditions that exist today (Current Baseline).

The Project has requested the following discretionary action:
1) A **Vesting Tentative Tract Map** pursuant to Los Angeles Municipal Code (LAMC) Section 17.15, to permit the airspace subdivision of the property into four lots containing one master lot and three (3) airspace lots containing 114 hotel guest rooms, parking, storage, and commercial/restaurant uses.

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[1] *The MND was adopted by the Zoning Administrator in conjunction with the approval of the CUB per Case No. ZA-2015-2671(CUB).*

2) A **Vesting Zone Change and Height District Change**, pursuant to LAMC Section 12.32.F, from C4-2D to (T)(Q)C2-2D to permit the new construction of a new mixed-use hotel with 79,918 square feet of floor area and a Floor Area Ratio of 3.7:1.
3) A **Conditional Use Permit,** pursuant to LAMC Section 12.24 W.1, for the on-site sale and dispensing of alcoholic beverages incidental to a proposed 114-guestroom hotel and ground floor restaurant with 100 seats (60 indoor seats and 40 outdoor seats).
4) A **Site Plan Review**, pursuant to LAMC Section 16.05 to permit the construction, use, and maintenance of a hotel with greater than 50 guest rooms.
5) Any additional actions as may be deemed necessary or desirable, including but not limited to, demolition, grading, excavation, haul route, and building permits.

APPLICANT: 6421 Selma Wilcox Hotel, LLC

PREPARED FOR: Los Angeles Department of City Planning

PREPARED BY: CAJA Environmental Services, LLC

SIGNATURE (OFFICIAL)	DATE
Charles J. Rauschenberger Jr.	12/29/17

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4. LIST OF PREPARERS

APPENDICES

A Plans, Killefer Flammang Architects, November 2017

B Shade Study, Steinberg, September 2015

C-1 Air Quality and Greenhouse Gases Appendices, DKA Planning, May 2017.

C-2 Original Baseline Air Quality, Greenhouse Gases, and Noise Appendices, DKA Planning, September 2015. (Note: Analyzed the Original Baseline for the Adopted MND)

D Trees, L. Newman Design Group, Inc., July 21, 2016

E-1 Archaeology response, South Central Coastal Information Center, May 26, 2016

E-2 Paleontology response, Los Angeles County Natural History Museum, June 1, 2016

E-3 Sacred Lands File Search, Native American Heritage Commission, May 19, 2016

F-1 Preliminary Geotechnical Engineering Investigation, GeoConcepts, Inc., November 25, 2014

F-2 Responsibility Approval Letter, Los Angeles Department of Building and Safety, July 2, 2015; Soils Report Approval Letter, Los Angeles Department of Building and Safety, December 27, 2014

G-1 Phase I Environmental Site Assessment, Partner Inc., September 26, 2014.

G-2 Phase II Subsurface Investigation Report, Partner Inc., November 4, 2014

H Noise Appendices, DKA Planning, October 2017

I-1 School Response, Los Angeles Unified School District, October 11, 2016

I-2 Parks Response, Los Angeles Department of Recreation and Parks, May 20, 2016

I-3 Library Response, Los Angeles Public Library, June 29, 2016

J-1 Traffic Impact Analysis, Overland Traffic Consultants, Inc., May 2017.

J-2 LADOT Approval Letter, June 11, 2017

J-3 Partial Off-Site Parking and Valet Service Evaluation, November 13, 2017

J-4 LADOT Approval Letter, December 6, 2017

K-1 Wastewater Response, Los Angeles Bureau of Sanitation, June 13, 2016

K-2 Wastewater Response, Los Angeles Bureau of Sanitation, August 17, 2016

K-3 Water and Power Response, Los Angeles Bureau of Sanitation, October 4, 2016

K-4 Natural Gas Response, Southern California Gas Company, May 18, 2016

CITY OF LOS ANGELES

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

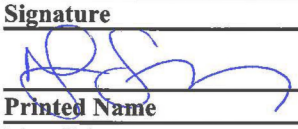
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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

Signature	**Date**
	12/29/17
Printed Name	
May Sirinopwongsagon	

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

BACKGROUND

PROPONENT NAME Selma Wilcox Hotel, LLC	**PHONE NUMBER** (323) 466-1400
PROPONENT ADDRESS 1605 Cahuenga Boulevard, Los Angeles, CA, 90028	
AGENCY REQUIRING CHECKLIST City of Los Angeles Department of City Planning	**DATE SUBMITTED** December 2017
PROPOSAL NAME (If Applicable) Selma Wilcox Hotel Project	

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

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

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

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	Service?				
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☐	☒	☐
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒
5.	**CULTURAL RESOURCES:** Would the project:				
a.	Cause a substantial adverse change in significance of a historical resource as defined in *State CEQA Guidelines* §15064.5?	☐	☐	☐	☒
b.	Cause a substantial adverse change in significance of an archaeological resource pursuant to *State CEQA Guidelines* §15064.5?	☐	☐	☒	☐
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d.	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
6.	**GEOLOGY AND SOILS.** Would the project:				
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

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

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
9.	**HYDROLOGY AND WATER QUALITY.** Would the proposal result in:				
a.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☐	☒
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☒	☐

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

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
12.	**NOISE.** Would the project:				
a.	Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b.	Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c.	Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d.	Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
13.	**POPULATION AND HOUSING**. Would the project:				
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
14.	**PUBLIC SERVICES.**				
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which				

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

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	in substantial safety risks?				
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
e.	Result in inadequate emergency access?	☐	☐	☒	☐
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐
17.	**TRIBAL CULTURAL RESOURCES.** Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
b.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐
18.	**UTILITIES AND SERVICE SYSTEMS.** Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	environmental effects?				
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
19.	**MANDATORY FINDINGS OF SIGNIFICANCE.**				
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☐	☒	☐
c.	Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	❑	❑	☒	❑
APPENDIX F: ENERGY CONSERVATION.					
a.	The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed?	☐	☐	☒	☐

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	The effects of the project on local and regional energy supplies and on requirements for additional capacity.	☐	☐	☒	☐
c.	The effects of the project on peak and base period demands for electricity and other forms of energy.	☐	☐	☒	☐
d.	The degree to which the project complies with existing energy standards.	☐	☐	☒	☐
e.	The effects of the project on energy resources.	☐	☐	☒	☐
f.	The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.	☐	☐	☒	☐

Project Design Features (PDFs) and Mitigation Measures (MMs)

Aesthetics

PDF-Aesthetics-1 **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.

PDF-Aesthetics-2 **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.

Noise

PDF-Noise-1 The rooftop deck would include a glass or heavy plastic safety wall (minimum 6 feet in height) around its perimeter.

Public Services

MM-Public-1 **Public Services (Police – Demolition/Construction Sites)**

Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

MM-Public-2 **Public Services (Police)**

The plans shall incorporate a design that references the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the LAPD. These measures shall be approved by the LAPD prior to the issuance of building permits.

MM-Public-3 Upon completion of the Project, the LAPD 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.

Transportation and Traffic

MM-Traffic-1 **Construction Traffic Control/Management Plan.** A construction work site traffic control plan shall be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction-related traffic shall be restricted to off-peak hours.

MM-Traffic-2 **Transportation Demand Management and Monitoring Program.**

- The Applicant shall prepare and submit a preliminary Transportation Demand Management Plan (TDM) to the Department of Transportation prior to the issuance of the first building permit for the Project. A final TDM shall be submitted and approved by the Department of Transportation prior to the issuance of the first certificate of occupancy for the project.

  The TDM shall include strategies, as determined to be appropriate by the Department of Transportation, which would have a minimum ten (10) percent effectiveness in reducing new vehicle trips.

  In the event that the Project would provide twenty (20) or more required parking spaces off-site, the TDM shall demonstrate a minimum twenty (20) percent effectiveness in reducing new vehicle trips.

- In the event that the Project would provide twenty (20) or more parking spaces off-site and is required to implement a TDM which has a minimum twenty (20) percent effectiveness in reducing the total net project trips, a Monitoring Program (MP) shall be prepared to provide continued monitoring of the TDP's effectiveness. The MP shall be prepared by a licensed Traffic Engineer and submitted to the Department of Transportation for review. The MP shall continue until such time that the Project has shown, for three consecutive years, at a minimum of 85 percent occupancy, achievement of the peak hour trip volume requirements listed. Should the review show that the peak hour trip cap threshold has been exceeded the Project shall have one year to attain compliance or be subject to a penalty program.

  Implementation of the TDM shall be at the Project's expense.

  Strategies may include, but shall not be limited to, the following:

  1. Provide guest assistance on arrival and departure to find options to personal or rented vehicles to access the site.

  2. If found feasible by LADOT and Metro, improve the existing bus stop on the north side of Hollywood Boulevard east of Wilcox Avenue where there is an existing sign, bench and trash receptacle with a weather protected cover. Improve the bus stop on the south side of Hollywood Boulevard west of Cahuenga Boulevard where a bus sign only with a bench, trash receptacle, weather protected cover and bench. Improve the bus stop on the north side of Sunset Boulevard west of Wilcox Avenue where a bus sign, a bench, and trash receptacle with a weather protected cover;

  3. Provide a visible on-site kiosk with options for ridesharing, bus routes and bike routes in a prominent area(s) in view for hotel guests, employees and patrons of the restaurants;

4. Provide information for guests of the hotel upon check in that includes the transit, bike routes, and nearby walking opportunities as options to use rather than person vehicles;

5. Provide an on-site TDM manager to assist hotel guests navigate the alternative modes of transportation options, in matching rideshare partners for the employees, determining transit routes for employees, and promoting TDM program;

6. Provide access pass and transit pass reductions for employees;

7. Provide bicycle spaces to encourage cycling as an alternative to single occupant vehicles;

8. Provide bicycle sharing service for guests and employees use;

9. Provide amenities to encourage guests of the hotel spend some of their time eating, relaxing and recreating on-site.

MM-Traffic-3 The developer and contractors shall maintain ongoing contact with administrator of Selma Elementary School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (213)580-2950 or (213)580-2900 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.

2. PROJECT DESCRIPTION

The analysis is based on two baseline conditions to account for a site condition prior to the development of the buildout analyzed in the Adopted MND (the Original Baseline) and a condition of the existing construction of the development analyzed in the Adopted MND (the Current Baseline). Because the construction of the Project will commence upon completion of the construction of the Approved Project, this dual baseline approach adequately considers the Project in relation to the impact analysis and mitigation required for the development of the Approved Project as well as adequately analyzes the Project after construction and ongoing operation of the Approved Project. Additional information on this dual baseline approach is under Existing Conditions, below.

The section is based in part on the following item, included as Appendix A of this Initial Study / Mitigated Negative Declaration (IS/MND):

A Plans, Killefer Flammang Architects, November 2017.

Introduction

Project Title: Selma Wilcox Hotel Project

Case Numbers: ENV-2016-2602-MND
CPC-2016-2601-VZC-HD-CUB-SPR
VTT-74406

Project Location: 6421-6429 W. Selma Avenue and 1600-1604 Wilcox Avenue, Los Angeles, CA 90028

Lead Agency: City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 763, Los Angeles, CA 90012

City Staff Contact: May Sirinopwongsagon, City Planner
may.sirinopwongsagon@lacity.org
213-978-1372

Applicant: 6421 Selma Wilcox Hotel, LLC
319 S. Robertson Boulevard, Beverly Hills, CA 90211

The subject of this IS/MND under the California Environmental Quality Act (CEQA) is the proposed Selma Wilcox Hotel Project (the Project), which consists of a new hotel development.

CEQA Statutes and Guidelines

According to California Public Resources Code Section 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

SECTION 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.*

SECTION 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 6421-6429 W. Selma Avenue and 1600-1604 N. Wilcox Avenue, Los Angeles, California 90028. The Project Site is an "L-Shaped" site located at the northeast corner of Selma Avenue and Wilcox Avenue. The site has 65 feet of frontage along the western side of Wilcox Avenue and approximately 200 feet of frontage along the northern side of Selma Avenue. The northeastern portion of the site extends 185 feet to the north, midblock between Wilcox Avenue and Cahuenga Boulevard. See **Figure 2-1 – Regional Map** and **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 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 Mulholland Drive and the Cities of West Hollywood and Beverly Hills, including a strip of land south of the City of West Hollywood and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue. Adjoining community plan areas include Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass to the north, Bel Air-Beverly Crest to the west, Wilshire to the south, and Silver Lake-Echo Park-Elysian Valley and Northeast Los Angeles to the east.

Regional and Local Access

Regional access is provided by the Hollywood Freeway (US-101) located approximately 2,800 feet northeast of the Project Site at Cahuenga Boulevard. Local access is provided by Cahuenga Boulevard, Wilcox Avenue, Selma Avenue, Sunset Boulevard, and Hollywood Boulevard.

Public Transit

The Los Angeles County Metropolitan Transportation Authority (Metro) provides bus and rail service to the Project Site. Service includes the Metro Red Line, which provides heavy rail service to Downtown Los Angeles, Koreatown, Hollywood, and North Hollywood. The Project Site is approximately 1,500 feet southwest of Metro's Hollywood/Vine Station and approximately 2,700 feet southeast of Metro's Hollywood/Highland Station. The Project is also located in proximity to numerous local and rapid bus services, including Metro lines 212/312, 217, 222 and DASH Hollywood at the intersection of Cahuenga and Hollywood, approximately 650 feet north of the Site.

Site Information

The Project Site is L-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 Project Site (entire L-shaped Site) has a total area of approximately 21,610.7 square feet (or 0.495 acres) (per KFA 2017). The Project Site is in the HCP area, zoned C4-2D (Commercial Zone, Height District 2, Development Limitation), the General Plan land use designation for the Project Site is Regional Center Commercial, and the Project Site is within the ZI-1352 and ZI-2277 Hollywood Redevelopment Project, ZI-2374 Los Angeles State Enterprise Zone, ZI-2452 Transit Priority Area, and ZI-2433 Revised Hollywood Injunction.[1]

Until recently, the Project Site was subject to the HCP Update, which was adopted by City Council on June 19, 2012 (and its associated zoning ordinance as Ordinance No. 182,173).[2] On December 10, 2013, the Superior Court of California issued a tentative ruling that the HCP Update and accompanying environmental impact report (EIR) were not legally adequate and should be invalidated.[3] 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 a resolution to rescind the HCP Update and adopted Ordinance No. 182,960 to repeal the associated zoning ordinance 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 HCP (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.

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[1] *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

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

[3] *Superior Court Judge Allan J. Goodman, December 10, 2013. Case Nos. BS138580, BS138169 and BS138370.*

Table 2-1
Project Site

Address	APN	Zone	General Plan Land Use	Size (sf)
1600, 1602, 1604 N. Wilcox Avenue, 6429, 6429 ½ W. Selma Avenue	5536-007-018	C4-2D	Regional Center Commercial	6,975.5
6425, 6425 ¼, 6425 ½, 6427 W. Selma Avenue	5546-007-024			2,446.5
6421, 6423 W. Selma Avenue	5546-007-023			4,589.3
None				3,909.4
None				3,585.2
None				104.8

*Source: Zone Information & Map Access System (*ZIMAS): http://zimas.lacity.org/.
Table by CAJA Environmental Services, April 2017.

Existing Conditions

The IS/MND proposes to analyze two baselines. First, the Original Baseline would describe the environmental conditions that existed at the time of the application for the conditional use permit to sell and dispense a full line of alcoholic beverages for on-site consumption, in conjunction with the operation of a new 20,624 square foot restaurant, having limited live entertainment, and a 6,000 square foot retail space, Approved Project, per Case No. ZA-2015-2671(CUB) (CUB Approval). The Approved Project was evaluated in an MND (ENV-2015-2672-MND) that was published in December 2015 (Adopted MND).[4] Second, the Current Baseline would describe the current physical conditions of the Project Site, which includes the recent partial construction of the Approved Project completed in 2017.

1. Original Baseline: The Original Baseline is the Project Site as it existed prior to the buildout of the development analyzed in the MND related to the CUB Approval, and contains an excavated area[5], an existing 3,174 square foot restaurant, an existing 1,650 square foot piano bar, and an existing 4,893 square foot building with vacant retail space on the ground floor and four residential units on the second floor.

2. Current Baseline: The Current Baseline includes the development contemplated in the Adopted MND. This development, as currently constructed, includes the following: a 20,624 square-foot quality restaurant and a partially constructed, three-level subterranean structure on the eastern portion of the

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[4] *The MND was adopted by the Zoning Administrator in conjunction with the approval of the CUB per Case No. ZA-2015-2671(CUB). The mitigation measures for the Approved Project have either been implemented or will be implemented by the Adopted MND.*

[5] *As noted in the Adopted MND for the Original Baseline, the proposed restaurant portion is already permitted and undergoing excavation and construction but for a conservative analysis, the Adopted MND has evaluated the total excavation and construction. This included an export of approximately 32,000 cubic yards.*

Project Site, and an excavated area, on the western portion of the Project Site that would be the 6,000 square feet of retail and remaining portion of the three-level subterranean structure contemplated in and to be constructed in accordance with the Adopted MND. The existing restaurant, on the eastern portion of the site, has an above grade height of 27 feet. As further detailed below under Construction Information, all the demolition, excavation, and construction of the Approved Project have been analyzed and mitigated in the Adopted MND.

Surrounding Uses

The parcels immediately surrounding the Project along Selma Avenue, and Wilcox Avenue, are zoned C4-2D and designated Regional Center Commercial. These properties are improved with a variety of neighborhood serving commercial uses.

- To the west across Wilcox Avenue are a United States Post Office and a hotel.
- To the south across Selma Avenue are commercial uses, a walk-in medical clinic, and surface parking.
- To the north, immediately adjacent to the Project Site, are a surface parking lot and a hotel.
- To the east, immediately adjacent to the Project Site at 64145 Selma Avenue, is a 10-story, 120-room hotel.

The nearest off-site residential uses are approximately 300 feet to the west on Schrader Boulevard, north of Selma Avenue (1611 N. Schrader Boulevard, 1616 N. Schrader Boulevard, and 1618 N. Schrader Boulevard); approximately 360 feet to the west of the project site at the southeast corner of Schrader Boulevard and Selma Avenue (1544-1552 N. Schrader Boulevard); and approximately 330 feet east of the Project Site at 1617 N. Cosmo Street (Cosmo Lofts).

- Selma Avenue Elementary School (6611 Selma Avenue) is approximately 700 feet west of the Site.
- Selma Park (6567 Selma Avenue) is approximately 475 feet west of the Site.

Proposed Project[6]

The Project would maintain portions of the Approved Project, which was analyzed as part of Case No. ENV-2015-2672-MND (Adopted MND). The Adopted MND analyzed the potential impacts of a proposed 20,624 square-foot restaurant, 6,000 square feet of ground floor retail, and the three levels of subterranean parking (Approved Project). The 20,624 square-foot restaurant and a portion of the three

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[6] *KFA Architects, November 2017.*

levels of subterranean was constructed on the eastern portion of the site. The Project proposes modifications to the western portion of the Approved Project, which included the 6,000 square-foot ground floor retail and a portion of the three levels of subterranean parking.

The Project is comprised of the following uses:[7]

- Maintenance of the previously approved, existing 20,624 square-foot restaurant;

- Maintenance of the previously approved three levels of subterranean parking;

    - A change of use of 1,939 square feet of the previously approved 6,000 square feet of retail space to a ground floor restaurant[8] with 100 seats (60 indoor and 40 outdoor seats); and

    - A change of use of 4,061 square of the previously approved 6,000 square feet and addition of 54,282 square feet for a 114 guestroom hotel which would include the following amenities: 819 square-foot lobby bar with 48 seats, rooftop pool and amenity deck with an approximately 5,807 square-foot rooftop bar with 73 seats.[9]

The Project would be analyzed against the two baselines described above. This way, the Project impacts would be measured against the physical conditions that existed prior to the CUB Approval (Original Baseline) as well as the physical conditions that exist today (Current Baseline).

The Adopted MND's restaurant space (20,624 square feet) would remain an existing restaurant and the retail space (6,000 square feet) would have a change in use to ground floor restaurant (1,939 square feet) and hotel lobby area, which includes hotel back-of-house, reception, lobby, and bar (3,143 square feet), and corridor spaces (1,122 square feet). The proposed new uses are fully analyzed in this current MND.

Floor Area and Density

The allowable floor-area-ratio (FAR) is 2:1 (or 43,221.4 square feet). The proposed FAR is 3.7:1. (79,918 square feet). The total floor area for the Project would consist of the existing 25,637 square feet of

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[7] *The lobby bar and rooftop deck and bar are ancillary to the hotel. They are not included in calculating vehicle and bike parking.*

[8] *The restaurant is a separate use from the hotel.*

[9] *The rooftop bar is not a restaurant, but could serve limited food from the ground-floor restaurant. It will contain bar and seating, pool area, ambient background music.*

restaurant and retail (Approved Project) and the proposed construction of 54,282 square feet of floor area, for a total of 79,918 square feet.[10]

The allowable density is unlimited per LAMC Section 12.22-A,18(a) and 12.12-C,4. The proposed density is 114 hotel rooms. The existing C4 Zone and proposed C2 Zone permits a maximum of one guest room per 200 square feet of lot area, or a maximum of 108 guest rooms for the Project Site. Pursuant to LAMC Section 12.22-A,18(a), R5 uses may be permitted in the specified commercial zones for mixed-use projects which are located on project sites located within a designated "Regional Center" or "Regional Commercial" area, as adopted by the Community Plan. The R5 Zone, pursuant to LAMC Section 12.12-C,4, permits one dwelling unit per 200 square feet of lot area and does not have a limitation on the minimum lot area per guest room.

Height

The allowable height is unlimited, with no story limit. The proposed height is 84'4".

Setbacks

Required and proposed setbacks are shown as follows:

Location	Required	Proposed
Front	None	None
Side Yard (at Commercial)	None	None
Side Yard (at Residential)	5' + 1' for each story above 2 = 11"	11'-0" (north) / 5'-0" (south along Selma Avenue)
Rear Yard (at Commercial)	None	None
Rear Yard (at Residential)	10' + 1' for each story above 3 = 20"	20'-0"

Amenities

The building will include standard guest amenities including a lobby, restaurant/bar space, and a pool. The Project includes a pool and viewing deck on the roof of the 8th floor that includes seating and lounge areas, a pool, as well as food and beverage service in the common area.

Landscaping

There are no native protected trees in or near the Project Site and no other trees of any kind within the Project Site. There are four magnolia trees located along Selma Avenue parkway whose trunk diameters range from three inches to five inches and therefore are not mature, significant trees. These are off-site

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[10] *Due to construction realities, the actual existing building is 25,637 square feet, which is 987 sf short than the Adopted MND's estimated 26,624 sf. Thus, this presents a slightly smaller existing building.*

street trees as part of the City's planting program and not native originating (natural to the location) trees. The trees remained in place as part of the Approved Project's construction and no change is expected under this Current Project. There is no landscaping or trees on the Project Site.

Access

Vehicle access to the on-site parking will be from a driveway off of Wilcox Avenue only. Pedestrian access will be provided on Selma Avenue. All trash, loading, and other back-of-house uses have been located within the interior of the building or subterranean parking structure.

Parking

Table 2-2 – Vehicle Parking Required, provides the amount of required parking by land use type and quantity. The Project is required to have 86 spaces (utilizing a permitted bike parking reduction). The Project would be served by a three level subterranean parking structure with a total of 50 spaces. The remaining 36 spaces would be accommodated by a parking structure as part of the permitted and under construction Thompson Hotel Project at 1541 Wilcox Avenue. Valet services will be provided along the north side of Selma Avenue and east side of Wilcox Avenue along the Project frontages. The main drop-off vehicle valet service will be provided along Selma Avenue. Due to the shared usage between the existing restaurant and proposed hotel of the valet service area on Selma Avenue, some of the patrons will make use of or be directed to the valet service area on Wilcox Avenue. Vehicles that approach the site from the east will need to circulate along Hollywood Boulevard, Sunset Boulevard and Cahuenga Avenue to approach the Selma Avenue valet zone in the westbound direction.

Table 2-2
Vehicle Parking Required

Use	Amount	Rate	Total spaces
Hotel Parking			
1st – 30 Guest rooms	30 rooms	1 space / room	30
31 – 60 Guest Rooms	30 rooms	1 space / 2 rooms	15
61 – 114 Guest Rooms	54 rooms	1 space / 3 rooms	18
		Subtotal	**63**
Restaurant Parking			
Restaurant	1,939 sf	1 space / 500 sf	4
		Existing Restaurant Required Parking	**41**
		Required Total	**108**
Bike Reduction – 15% for residential and 30% for commercial uses within 1,500 feet of Hollywood/Vine Metro			
		Hotel (9.45 space reduction)	54
		New Restaurant and Existing Restaurant (13.5 space reduction)	32
		Required Total	**86**
The Existing Restaurant (20,624 sf) in the Approved MND required 41 parking spaces. *City of Los Angeles Municipal Code (Section 12.21.A4).* *Table by CAJA Environmental Services, October 2017.*			

Bicycles

LAMC Section 12.21-A,16(a)(2) requires new projects to provide bicycle parking spaces. A hotel is required to provide one short-term bicycle space per 20 guest rooms and one long-term bicycle space per 20 guest rooms. 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 would protect bicycles from inclement weather. Bicycle parking would be provided according to LAMC. As shown in **Table 2-3 – Bicycle Parking Required**, the Project will provide, at a minimum, 17 short-term and 17 long-term bicycle spaces. Per LAMC 12.21-A,4, shown in Table 2-2 above, 22 vehicles parking spaces would be replaced with 88 bicycle parking spaces at a ratio of one vehicle for every four bicycle spaces. It is not anticipated that hotel guests will arrive via bicycle. However, it is anticipated that employees of the hotel may arrive via bicycle, and the hotel may offer free bicycles to their guests to experience the Hollywood community.

Table 2-3
Bicycle Parking Required

Use	Amount	Rate	Short-Term	Long-Term
Hotel	114 rooms	1 per 20 rooms (long-term and short-term)	6	6
Restaurant	1,939 sf	1 per 2,000 sf (long-term and short-term)	1	1
Existing Restaurant	20,624 sf	1 per 2,000 sf (long-term and short-term)	10	10
		Subtotal	**17**	**17**
Additional bicycle parking per LAMC 12.21 A4			54	
		Total	**88**	

The Existing Restaurant (20,624 sf) in the Approved MND required 10 short-term and 10 long-term spaces.
Municipal code 12.21 A.16(a)(2)
Table by CAJA Environmental Services, December 2017.

Green/Conservation Features

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2016 California Green Building Standards Code (CALGreen, effective January 1, 2017).[11]

The Project will be sustainably designed to meet and/or exceed all current City building code and CALGreen requirements. As such, the development will incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-volatile organic compound (VOC) paints/adhesives, drought tolerant planting, and a high performance building envelopment. In addition to on-site sustainable construction and operational measures, the Project is seeking to implement an aggressive alternative transit program to encourage

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

people to visit the hotel and adjacent retail and restaurant uses via other means of transit than personal cars. The hotel will provide incentives to guests and visitors for hybrid and/or electric car parking and provide a bicycle sharing program for access to the adjacent bike path and the local surrounds. The hotel will also implement transit and carpool incentives for construction and operational staff to minimize traffic trips to the site. Guests will be offered electric vehicle and/or alternative airport transportation options when traveling to/from an airport. A bike valet/lending program may be provided as a hotel amenity either by the hotel or through a local cyclery partnership.

Construction Information

The estimated construction schedule is shown in **Table 2-4 – Construction Schedule**. Given that the Project will be built on top of a portion of the buildings described in the Approved Project, construction of the Project will commence upon completion of the demolition, excavation and construction of the Approved Project. Operation would be in 2020.[12] The structures on the western portion of the Project Site have already been demolished and therefore, no additional demolition for the Project would occur. Additionally, the western portion of the site has already been excavated and graded, and no additional excavation or grading is anticipated.

It is anticipated that the construction debris would be transported to the Sunshine Canyon Landfill in Sylmar. The haul route is approximately 20 miles and will generally include: local streets (Cahuenga Boulevard) to US-101 freeway to CA-170 freeway to I-5 freeway to Sepulveda Boulevard to San Fernando Road to Sunshine Canyon Landfill.

Table 2-4
Construction Schedule

Phase	Schedule	Duration
Construction	January 15, 2018 – October 15, 2018	9 months
Architectural Coating	October 16, 2018 – April 16, 2019	6 months
Construction schedule and timing are estimates only. *Source: Team provided April 2017.* *Table: CAJA Environmental Services, April 2017.*		

The Adopted MND previously analyzed and mitigated the impacts of demolition, excavation, and construction for the Original Baseline. Specifically, the Approved Project already considered and analyzed the following: The restaurant portion would include demolition of one building, excavation down to approximately 33 feet for three subterranean parking levels, export of 14,000 cubic yards of soil, and construction of an approximately 20,624 square-foot restaurant space. The restaurant portion was

[12] *Traffic MOU, Overland Traffic, April 2017.*

already permitted and undergoing excavation and construction but for a conservative analysis, the MND evaluated the total excavation and construction. The retail portion would include demolition of two buildings, excavation down to approximately 33 feet for three subterranean parking levels, export of 18,000 cubic yards of soil, and construction of an approximately 6,000 square feet retail space. The total export was approximately 32,000 cubic yards.

Project Objectives

The objectives of the Project are as follows:

- Develop a site that combines hotel, retail, and restaurant uses.
- Support infill development and redevelopment in existing urban areas to reduce "greenfield" development and urban sprawl.
- Respond to the continuous demand for new hotel rooms in the City and specifically in the Hollywood sub-market, as identified in the Report of the Chief Legislative Analyst to the Members of the City's Housing, Community and Economic Development Committee dated August 6, 2013.[13]
- Provide a lodging option for leisure and business travelers, tourists and visiting friends/relatives of local residents.
- Target an underserved segment of the tourist market with a hotel concept in Hollywood with proximity to some of the region's most popular tourist, cultural and entertainment destinations.
- Leverage the billions of public investment dollars on local transit facilities and infrastructure, including the Metro Red Line stations located nearby.
- Construct an iconic, contemporary hotel project on Selma Avenue, near Cahuenga Boulevard.
- Contribute to the economic recovery of the City by developing hotel uses that generate local tax revenues, provide new jobs, and host hotel guests who support local businesses, including dining, shopping and entertainment venues nearby.
- Create an architecturally-inspired development that is economically sustainable and compatible with surrounding land uses.

Discretionary Actions

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

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

1) A **Vesting Tentative Tract Map** pursuant to LAMC Section 17.15, to permit the airspace subdivision of the property into four lots containing one master lot and three (3) airspace lots containing 114 hotel guest rooms, parking, storage, and commercial/restaurant uses.

2) A **Vesting Zone Change and Height District Change**, pursuant to LAMC Section 12.32.F, from C4-2D to (T)(Q)C2-2D to permit the new construction of a new mixed-use hotel with 79,918 square feet of floor area and a FAR of 3.70:1.

3) A **Conditional Use Permit,** pursuant to LAMC Section 12.24 W.1, for the on-site sale and dispensing of alcoholic beverages incidental to a proposed 114-guestroom hotel and ground-floor restaurant with 100 seats (60 indoor seats and 40 outdoor seats).

4) A **Site Plan Review**, pursuant to LAMC Section 16.05 to permit the construction, use, and maintenance of a hotel with greater than 50 guest rooms.

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

Pursuant to various sections of the LAMC, the applicant would request approvals and permits from the City's Department of Building and Safety (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 is also intended to cover all federal, state, regional and/or local government discretionary approvals that may be required to develop the Project, whether or not they are explicitly listed above.

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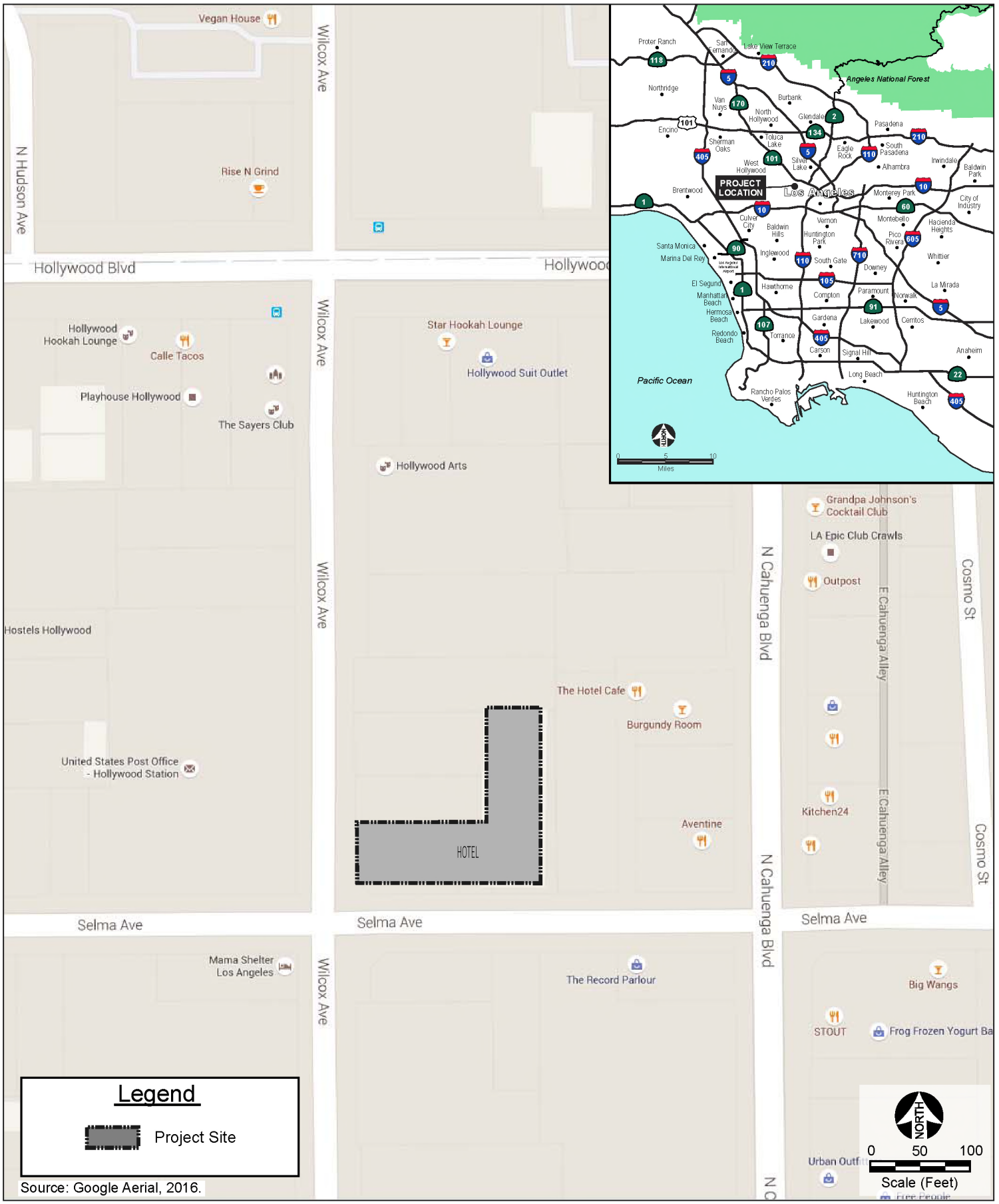
[14] *Master Land Use Application, July 2016. Updated in May 2017.*



CAJA Environmental Services, LLC

Figure 1
Regional Map

CAJA Environmental Services, LLC

Figure 2
Aerial Map

3. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS

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

B Shade Study, Steinberg, September 2015.

In 2013, the State of California enacted Senate Bill (SB) 743. Among other things, SB 743 adds Public Resources Code Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact threshold in the *L.A. CEQA Thresholds Guide*.

This analysis is provided herein for full disclosure so the public and decision-makers can consider and evaluate this potential impact, even though Senate Bill No. 743[1], effective as of January 1, 2014, amended California Environmental Quality Act (CEQA) in pertinent part to add Public Resources Code Section 21099 to provide that the aesthetics of a project that is an employment center project on an infill site within a transit priority area shall not be considered a significant impact under CEQA.[2]

The Project is an employment center project, which is defined as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.[3] The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been previously developed.[4] The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit stop.[5] The Project Site

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

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

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

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

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

is within one-half mile of two Metro Red Line subway stations nearby (approximately 1,500 feet southwest of Metro's Hollywood/Vine Station and approximately 2,700 feet southeast of Metro's Hollywood/Highland Station). The Project is also proximately located to numerous local and rapid bus services, including Metro lines 212/312, 217, 222 and DASH Hollywood at the intersection of Cahuenga and Hollywood, approximately 650 feet north of the Site.

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 Project Site is located in the Hollywood Community Plan (HCP) in the City of Los Angles (City), approximately 5.5 miles northwest of Downtown Los Angeles and 11 miles east (inland) from the Pacific Ocean. The HCP covers 25 square miles, extending roughly south of Mulholland Drive and the Cities of Burbank and Glendale and the US-101 Freeway; west of the I-5 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-Elysian Valley 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 immediate area along Selma Avenue contains commercial, hotel, office, and restaurant uses. Nearby Cahuenga Boulevard contains similar uses. The nearest off-site residential uses are approximately 300 feet to the west on Schrader Boulevard; and approximately 330 feet east of the Project Site at Cosmo Street (Cosmo Lofts). The Project Site is in a densely developed urban flat area of the HCP area with a street system that follows an orderly grid layout. 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.

There are no tall or topographic features on the Project Site from which scenic vistas may be viewed 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. Selma Avenue provides the major east-west axis view corridor. North-south axis views are available from Cahuenga Boulevard and Wilcox Avenue. The local area is relatively flat with no elevated positions on which any public views could be claimed. Views from the south side of Selma Avenue looking north toward the Project Site show no substantial views.

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 one 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.[6] Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc.[7] The hotel building would be similar in height to the nearby 5 story hotel building (6500 Selma Avenue), and thus will not introduce an incompatible scenic element into the community. To the east, immediately adjacent to the Project Site, is a recently completed 10-story hotel. No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. As per ZI No. 2452 and SB 743, aesthetic impacts of the Project "shall not be considered significant impacts on the environment."

Original Baseline

Under the Original Baseline, the Project will not have a substantial adverse effect on a scenic vista, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project will not have a substantial adverse effect on a scenic vista, and the impacts will be less than significant.

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

Less Than Significant Impact. A significant impact would occur 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 6.25 southeast of the Project Site. The Pacific Coast Highway (State Route 1) is an "Eligible State Scenic Highway – Not Officially Designated", and is approximately 12 miles west of the

[6] *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. (2004) 116 Cal.App.4th 396, 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Cmty v. City of Oceanside (2004) 119 Cal.App.4th 477, 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"].)*

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

Project Site.[8] There is no designated scenic highway on any street around the Project Site.[9]

There are four street trees on the City sidewalk along Selma Avenue. These off-site street trees are part of the City's planting program and not native originating (natural to the location) trees. The Project would not result in damage to scenic resources. As per ZI No. 2452 and SB 743, aesthetic impacts of the Project "shall not be considered significant impacts on the environment."

Original Baseline

Under the Original Baseline, the Project will not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, historic buildings, or a scenic highway, and the impacts to scenic resources will be less than significant.

Current Baseline

Under the Current Baseline, the Project will not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, historic buildings, or a scenic highway, and the impacts to scenic resources will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site. The Project proposes to develop the site with a mixed-use building which would include a ground floor restaurant at the corner of Selma Avenue and Wilcox Avenue which would include outdoor seating, assisting in activating the sidewalk. The remaining ground floor area will be developed with the lobby and accessory uses for the proposed 114-guest room hotel. The proposed use of the site would be compatible with surrounding uses in the area. The proposed contemporary building design would use materials and design features found in the surrounding buildings. As such, the Project would not degrade the existing visual character or quality of the Project Site and its surroundings.

While the new construction is occurring, construction walls and barriers may be erected, which have the potential to attract unauthorized bills and postings. These walls and barriers may be located along the Project Site frontages on Selma Avenue and Wilcox Avenue. Compliance with the regulations will ensure that aesthetic impacts related to construction walls and barriers are less than significant.

All parking, trash, loading, and other back-of-house uses would be located within the interior of the building or subterranean parking structure, out of sight from residents of the community, or from

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

[9] *http://planning.lacity.org/documents/policy/mobilityplnmemo.PDF.*

neighboring properties. All rooftop equipment and infrastructure would be screened to ensure development compatible with existing properties. Off-street parking would be provided in three subterranean parking levels with access along Wilcox Avenue. Project lighting would be directed on-site and designed to minimize light and glare impacts on adjacent properties.

The Project at the ground floor has been carefully designed to maximize the pedestrian experience, with a glass façade and pedestrian entrances at the Selma Avenue street frontage. As shown in the landscape plans for the Project, courtyards, green roofing, and a landscaped building façade are proposed to provide a sense of place for pedestrians visiting the area. Unique architectural facades and building materials are utilized to ensure an inviting pedestrian experience along the entirety of the Project street frontage. The Project is designed to closely integrate with the scale and character of the existing regional commercial uses nearby.

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. The building design makes a clear distinction between the existing ground floor commercial uses and the upper level hotel uses with a transition element of color accents and window sizing and placement. The ground floor storefront glass windows take up a larger portion of the wall area whereas the hotel windows are smaller for privacy. While the two uses (commercial and hotel) 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 building would use a variety of materials such as wood panels, steel, and painted veneers to provide different textures and elements in the building façade. The Project supports walkability with ground floor commercial. Moreover, the Project's design reduces its apparent bulk and mass. The façade features articulation (window and stepbacks) and material changes to reduce its apparent bulk.

There will be landscaping around the Project Site at the ground floor, in a central courtyard, and on the rooftop pool area. The Project would be landscaped according to Los Angeles Municipal Code (LAMC) Section 12.40 and 12.41. The Project would comply with LAMC Section 91.8104, which requires the buildings be maintained in a safe and sanitary condition to discourage vandalism and graffiti. While the Project Site is under construction, construction walls and barriers would be erected, which have the potential to attract unauthorized bills and postings. The Project would comply with LAMC Section 91.6205, which regulates signage on construction barriers.

Original Baseline

Under the Original Baseline, the Project would not degrade the existing visual character or quality of the Project Site and its surroundings, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not degrade the existing visual character or quality of the Project Site and its surroundings, and the impacts will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if the Project was 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. As per ZI No. 2452 and SB 743, aesthetic impacts of the Project "shall not be considered significant impacts on the environment."

Light

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding commercial uses. Vehicle headlights from traffic traveling along Selma Avenue, Cahuenga Boulevard, and Wilcox Avenue also contribute to overall ambient lighting levels. The Project would create additional sources of illumination. The Project would include lighting for signage, safety and security, and wayfinding. Lighting would 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. The residential uses are buffered from ambient light impacts by existing buildings along Selma Avenue and the distance of approximately two blocks. There is no direct line of sight between residential uses and the proposed uses. 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. As per ZI No. 2452 and SB 743, the change in levels of ambient illumination are considered to be less than significant. See also project design features below.

The previously Approved Project was determined to have less than significant impacts with the incorporation of Mitigation Measure 1-1 in the Adopted MND. The mitigation measure required outdoor lighting to be designed and installed with shielding so that the light source could not be seen from adjacent residential properties or the public right of way

The mitigation measure was incorporated as part of the Conditions of Approval of Case No. ZA 2015-2671(CUB). The portion of the Approved Project, which was constructed, the existing 20,624 square-foot restaurant, was required to comply with the condition prior to the issuance of permits. As discussed above, per SB 374, changes in the levels of ambient illumination would as a result of the Proposed Project would be considered less than significant due to the urban nature surrounding the Project Site. As such, impacts would be considered less than significant and the previously adopted Mitigation Measure 1-1 would no longer be necessary to reduce potential impacts. The Project would incorporate a lighting plan in which the outdoor lights would be designed and installed so that the light sources would not be seen from adjacent residential properties, the public right of way, nor from above, as described in **PDF-Aesthetics-1**.

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 and this increase in surfaces would have the potential to reflect light onto adjacent roadways and land uses. However, the glass that will be incorporated into the facades of the building would either be of low-reflectivity or accompanied by a non-glare coating. As per ZI No. 2452 and SB 743, the Project would not result in a new source of substantial glare and impacts would be less than significant. See also project design features below.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the sun. Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e., time of day) and elliptical orbit (i.e., change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months. "Solstice" is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun's apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 1/2° of the arc. At winter solstice, about December 21, 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 21, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur

throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year.

Screening Criteria and Thresholds of Significance[10]

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 (Neg. Dec.), Mitigated Negative Declaration (MND) or Environmental Impact Report (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's proposed height is 84'4", measuring to the top of roof. Thus, the Project exceeds the screening criteria for shadow analysis. As stated above, the screening criteria looks at distances three times the height of the proposed structure to any shadow sensitive uses. Three times the Project's 84' 4" height equals 253 feet. Per the screening criteria of the *L.A. CEQA Thresholds Guide*, there are no shadow-sensitive uses within approximately 253 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 9:00 AM to 0 degree/north at 12:00 PM to 45/east at 3:00 PM). The surrounding area contains the Wilcox Hotel, surface parking lot, United States Post Office Building, the Dream Hotel, an alley and commercial uses. These buildings do not have useable outdoor space and are not considered shadow sensitive.

The shadow study takes into account the shadows of the existing uses and surrounding uses that also cause shadows. As shown in Appendix B, the building would cast summer shadows along Wilcox

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

Avenue to the west in the morning (9:00 AM), the surface parking lot to the north by mid-day (1:00 PM), and Selma Avenue to the southeast in the evening (5:00 PM).

As shown in Appendix B, the building would cast winter shadows along Wilcox Avenue, the surface parking lot, and portions of the United States Post Office Building to the northwest in the morning (9:00 AM), the surface parking lot to the north by mid-day (12:00 PM), and the surface parking lot and adjacent hotel in the late afternoon (3:00 PM). These buildings do not have useable outdoor space or are considered shadow sensitive. No sensitive use is shaded for more than four hours in the summer or three hours in the winter.

Therefore, there would be no impact to shadow-sensitive uses.

Project Design Features

PDF-Aesthetics-1 **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.

PDF-Aesthetics-2 **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.

Original Baseline

Under the Original Baseline, the Project will not create a new source of substantial light, glare or shadows that affect sensitive receptors, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project will not create a new source of substantial light, glare or shadows that affect sensitive receptors, and the impacts will be less than significant.

2. AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. A significant impact may occur if a project were to result in the conversion of state-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is zoned C4-2D (Commercial Zone, Height District 2, Development Limitation), and the General Plan land use designation is Regional Center Commercial. The Project Site is developed with a 20,624 square-foot restaurant, a portion of the proposed three levels of subterranean parking, and an excavated area. 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.[11]

Original Baseline

Under the Original Baseline, the Project would have no impact on the conversion of farmland to non-agricultural uses.

Current Baseline

Under the Current Baseline, 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.[12] 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.

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[11] *State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2014, Map, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/los14.pdf, February 6, 2017.*

[12] *State of California Department of Conservation, Williamson Act Program, website: http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, February 6, 2016.*

Original Baseline

Under the Original Baseline, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

Current Baseline

Under the Current Baseline, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. Neither the Project Site nor surrounding parcels are zoned for forest land or timberland.

Original Baseline

Under the Original Baseline, no impacts related to forest land or timberland will occur.

Current Baseline

Under the Current Baseline, 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.

Original Baseline

Under the Original Baseline, no impact related to the loss of forest land or conversion of forest land will occur.

Current Baseline

Under the Current Baseline, 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 the HCP area, which is highly urbanized. Neither the Project Site nor surrounding parcels are utilized for agricultural uses nor are forest land and such uses not in proximity to the Project Site.

Original Baseline

Under the Original Baseline, no impacts related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use will occur.

Current Baseline

Under the Current Baseline, 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 items, included as Appendix C of this IS/MND:

C-1 Air Quality and Greenhouse Gases Appendices, DKA Planning, May 2017.

C-2 Original Baseline Air Quality, Greenhouse Gases, and Noise Appendices, DKA Planning, September 2015. (Note: Analyzed the Original Baseline for the Adopted MND).

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 2016 Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Management District (SCAQMD). SCAQMD adopted the final 2016 AQMP in March 2017.[13] SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, 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. SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces measures though educational programs or fines, when necessary.

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 monoxide and dioxide (NO and NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter ten microns or less in diameter (PM_{10}), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions; primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in

[13] *SCAQMD, AQMP: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp*

urban areas between November and February.[14] The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

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

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

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

- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g., motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2, NO_X, and volatile organic chemicals (VOC).

[14] *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.*

Inhalable particulate matter, or PM_{10}, is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

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

- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, 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 (TACs) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by state and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

Regulatory Setting

Federal

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also

responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in states other than California, where automobiles must meet stricter emission standards set by California Air Resources Board (CARB). As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in *Table 3.3-1*. The USEPA has classified the Los Angeles County portion of the Basin as nonattainment for O_3 and $PM_{2.5}$, attainment for PM_{10}, maintenance for CO, and attainment/unclassified for NO_2.

State

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 state standards are summarized in *Table 3.3-1*. The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Table 3.3-1
State and National Ambient Air Quality Standards and Attainment Status

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

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

Source: CARB, Ambient Air Quality Standards, and attainment status, accessed December 16, 2016. (www.arb.ca.gov/desig/adm/adm.htm)

SCAQMD. The 1977 Lewis Air Quality Management Act merged four air pollution control districts creating 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. 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. SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including 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. 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. SCAQMD prepares the AQMP to address CAA and CCAA requirements by identifying policies and control measures. In April 2016, SCAQMD adopted its 2016 AQMP, which is now the legally enforceable plan for meeting the 24-hour $PM_{2.5}$ strategy standard.

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

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

Air Pollution Climatology

The Project site is located within the Los Angeles County non-desert portion of Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific Ocean, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction

between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains. Air quality problems also occur during the fall and winter, when CO and NO_2 emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 PM) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO_2 concentrations are also generally higher during fall and winter days.

Air Monitoring Data

SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project Site is located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project Site. *Table 3.3-2* shows pollutant levels, state and federal standards and the number of exceedances recorded in the area from 2014 through 2016. The one-hour state standard for O_3 was exceeded seven times during this three-year period, the daily state standard for PM_{10} was exceeded 29 times while the daily federal standard for $PM_{2.5}$ was exceeded seven times. CO and NO_2 levels did not exceed the CAAQS from 2014 to 2016.

Table 3.3-2
2013-2015 Ambient Air Quality Data In Project Vicinity

Pollutant	Pollutant Concentration & Standards	Central Los Angeles		
		2014	2015	2016
Ozone	Maximum 1-hour Concentration (ppm)	0.113	0.104	0.103
	Days > 0.09 ppm (State 1-hour standard)	3	2	2
	Days > 0.075 ppm (Federal 8-hour standard)	2	0	1
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	N/A	3.2	1.9
	Days > 20 ppm (State 1-hour standard)	N/A	0	0
	Maximum 8-hour Concentration (ppm)	2.0	1.8	1.4
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0821	0.0791	0.0647
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}	Maximum 24-hour Concentration ($\mu g/m^3$)	66	88	67
	Days > 50 $\mu g/m^3$ (State 24-hour standard)	3	26	N/A
$PM_{2.5}$	Maximum 24-hour Concentration ($\mu g/m^3$)	N/A	56.4	44.39
	Days > 35 $\mu g/m^3$ (Federal 24-hour standard)	N/A	7	N/A
Sulfur Dioxide	Maximum 24-hour Concentration (ppm)	N/A	12.6	13.4
	Days > 0.04 ppm (State 24-hour standard)	N/A	0	0

Source: SCAQMD annual monitoring data (www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year) accessed October 2, 2017.
N/A: Not available at this monitoring station. Monitoring stations often do not measure every pollutant

Toxic Air Pollution

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV)[15] the incidence of cancer over a lifetime in the US population is about one in four, to one in three, which translates into a risk of about 300,000 in 1,000,000.[16] One study, the *Harvard Report on Cancer Prevention*, estimated that, of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about two percent were associated with environmental pollution related exposures[17] The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per 1,000,000, this would predict an additional 100 excess cases of cancer in a population of 1,000,000 people over a 70-year lifetime.

As part of SCAQMD's environmental justice initiatives adopted in late 1997, SCAQMD adopted the MATES IV study in May 2015, which was a follow-up to the previous MATES I, II, and III air toxics studies conducted in the Basin. The MATES IV study was based on actual monitored data throughout the Basin and consisted of several elements. These included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Basin from exposure to TACs. The MATES IV study applied a 2-kilometer (1.24-mile) grid over the Basin and reported carcinogenic risk within each grid space (each covering an area of 4 square kilometers or 1.54 square miles). The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 897 in 1,000,000 primarily due to diesel exhaust particulate matter (DPM). Using the MATES IV methodology, about 94 percent of the cancer risk is attributed to emissions associated with mobile sources, and about six percent of the risk is attributed to toxics emitted from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations. The MATES IV study found lower ambient concentrations of most of the measured air toxics, as compared to the levels measured in the previous MATES III study finalized in September 2008.

Thresholds of Significance

For the purposes of this analysis, air quality impacts of the Project would be considered significant if they would exceed the following Thresholds of Significance, which are based on Appendix G of the CEQA Guidelines.[18] According to the CEQA Guidelines, a project would normally have a significant impact on air quality if it would:

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[15] *MATES IV.*

[16] *SCAQMD 2015.*

[17] *Harvard 1996.*

[18] *The CEQA Guidelines are codified at Title 14 California Code of Regulations section 15000 et seq.*

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollution concentrations; or
- Create objectionable odors affecting a substantial number of people.

The CEQA Guidelines Section 15064.7 provides the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance. The potential air quality impacts of the proposed project are, therefore, evaluated according to thresholds developed by the SCAQMD in their *CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook*, and subsequent guidance, which are listed below.

Existing Emissions

Table 3.3-3 summarizes the operational emissions based on the Original Baseline environmental analysis. It should be noted that these emissions identified in the Adopted MND are included with the Current Baseline, as no existing improvements would be demolished as part of the Project. These uses produced minimal emissions on an operational basis and were subsequently demolished to accommodate the Current Baseline.

Table 3.3-3
Original Baseline Estimated Existing Daily Operations Emissions

Emission Source	Pounds per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	<1	0	<1	<1	0	0
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	4	17	<1	3	1
Total Operations	2	5	18	<1	3	1

Source: DKA Planning 2015 based on CalEEMod 2013.2.2 model runs. Included in appendices of ENV-2015-2672-MND and incorporated by reference to this MND.

Table 3.3-4 summarizes the operational emissions based on the Current Baseline environmental analysis. It should be noted that these emissions would continue with the Project, as no existing improvements would be demolished.

Table 3.3-4
Current Baseline Estimated Existing Daily Operations Emissions

Emission Source	Pounds per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	1	<1	<1	<1	<1	<1
Energy Sources	<1	1	1	<1	<1	<1
Mobile Sources	7	20	82	<1	4	4
Total Operations	**8**	**21**	**83**	**<1**	**14**	**4**

Source: DKA Planning 2017 based on CalEEMod 2016.3.1 model runs.

Consistency with Air Quality Plans

SCAQMD Air Quality Management Plan. The Project will neither conflict with SCAQMD's 2016 AQMP nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by SCAG. Specifically, SCAG's growth forecasts from the 2016 RTP/ SCS are largely built off local growth forecasts from local governments like the City. The 2016 RTP/SCS released for public review on December 4, 2015 accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the City's HCP area. The HCP implements land use standards of the General Plan Framework at the local level. The Project is consistent with the City's projected growth capacity for the HCP area, which accommodated a projected population of 233,000 persons, housing base of 115,000 units, and 129,000 jobs by 2040.[19]

The Project proposes to maintain the existing restaurant and to construct a new 1,939 square-foot restaurant and a 114 guest room hotel with accessory uses in the City. The Project would not add residents to the AQMP. The Project Site is designated by the Community Plan for commercial uses and is zoned C4, which is a zoning classification that would permit the proposed uses. The requested zone change to C2 would permit the proposed uses at the same density of the existing C4 Zone. As such, the RTP/SCS's assumptions about growth in the City likely accommodate employment growth on the Project Site. As such, the Project does not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

City of Los Angeles General Plan Air Quality Element. The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As illustrated in *Table 3.3-5*, the Project is consistent with the applicable policies in the General Plan. As such, the Project's impact on the City's General Plan would be considered less than significant.

[19] *City of Los Angeles, Hollywood Community Plan NOP., http://planning.lacity.org/eir/nops/HwdUpdate/nop.pdf.*

The air quality impacts of development on the Project Site are accommodated in the region's emissions inventory for the 2016 RTP/SCS and 2016 AQMP. The Project is therefore not expected to conflict with or obstruct implementation of the AQMP, and any impact on the AQMP would be considered less than significant. Similarly, the Project is consistent with the City's General Plan Air Quality Element's policies and would not conflict with its six goals and 15 objectives.

Table 3.3-5
Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**Consistent.** The Project would minimize particulate emissions during construction through best practices required by SCAQMD Rule 403 (Fugitive Dust) and/or regulatory measures.
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent.** The Project would minimize particulate emissions from unpaved facilities through best practices required by SCAQMD Rule 403 (Fugitive Dust) and/or regulatory measures.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority (Metro) (i.e., Routes 2, 302, 210, DASH Hollywood) approximately 650 feet north and the Metro Red Line stations at Hollywood and Highland and at Hollywood and Vine about 0.5 miles away. Ample bicycle facilities would be located on-site to encourage active transportation.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Consistent.** Where appropriate, the property management company could encourage telecommuting with future tenants.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Not Applicable.** Where appropriate, the property management company could encourage future tenants to promote rideshare programs and subsidies. The project would have WiFi available for guests that would encourage telecommuting.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Not Applicable.** The Project includes employers that could implement parking management programs.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Consistent.** The Project includes a Transportation Demand Management (TDM) program that will encourage public transit and ride-sharing.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** The Project would minimize traffic impacts below significance thresholds.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Metro, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The Project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form	**Not Applicable.** This policy calls for City updates to its General Plan.

Table 3.3-5

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

Strategy	Project Consistency
and to promote more transit-oriented development and mixed-use development.	
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The Project would be infill development that would provide residents with proximate access to jobs, shopping, and other uses.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities with alternative transportation modes, including proximity to bus routes operating by Metro (i.e., Routes 2, 302, 210, DASH Hollywood) approximately 650 feet north and the Metro Red Line stations at Hollywood and Highland and at Hollywood and Vine about 0.5 miles away. Ample bicycle facilities would be located on-site to encourage active transportation.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The Project's air quality impacts will be analyzed and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by Metro (i.e., Routes 2, 302, 210, DASH Hollywood) approximately 650 feet north and the Metro Red Line stations at Hollywood and Highland and at Hollywood and Vine about 0.5 miles away.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Not Applicable.** This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Not Applicable.** This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.

Table 3.3-5
Project Consistency With City Of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 5.3.1. Support the development and use of equipment powered by electric of low-emitting fuels.	**Consistent.** The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City of Los Angeles' Green Building Code (LAGBC).
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs.
Table: CAJA Environmental Services, 2017.	

Original Baseline

Under the Original Baseline, the Project will not conflict with or obstruct the implementation of the applicable air quality plans, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project will not conflict with or obstruct the implementation of the applicable air quality plans, and the impacts will be less than significant.

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

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

Project Impacts

Construction Phase

Construction-related emissions were estimated using SCAQMD's California Emissions Estimator Model (CalEEMod) 2016.3.1 model using assumptions from the Project's developer, including the Project's construction schedule of 15 months. Operation would be in 2020.[20] Under the Project Site's current condition, the Project will be built on top of a portion of the buildings described in the Approved Project.

[20] *Traffic Impact Study, Overland Traffic, May 2017.*

The structures on the western portion of the Project Site have already been demolished, excavated, and graded, and therefore, no excavation, grading, or building demolition would occur for the Project.

As shown in *Table 3.3-6*, the construction of the Project (Current Baseline) would produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed SCAQMD's regional thresholds. As a result, construction of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

Table 3.3-6
Estimated Daily Construction Emissions - Unmitigated

Construction Year	Pounds Per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2018	6	29	25	<1	3	2
2019	6	22	11	<1	1	1
Maximum Regional Total (maximum daily emissions for each pollutant regardless of phase)	6	27	25	<1	3	2
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	6	26	19	<1	2	1
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	No	No	No	No	No	No

These figures are rounded to the nearest integer.
Source: DKA Planning, 2017 based on CalEEMod 2016.3.1 model runs. Data in Appendix to this IS/MND.
LST analyses based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.

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

As shown in *Table 3.3-6*, construction of the Project under current conditions is not expected to produce any local violation of air quality standards or contribute substantially to an existing or projected air quality violation.

The construction emission impacts due to the Original Baseline were analyzed in the Adopted MND (ENV-2015-2672-MND) for the CUB Approval. Impacts would be less than significant. The results of the analysis are incorporated by reference.

The Adopted MND conservatively analyzed the demolition of all existing structures, as well as the excavation of approximately 32,000 cubic yards of dirt. Additionally, the Adopted MND analyzed construction impacts for a proposed 20,624 square-foot restaurant and 6,000 square feet of commercial

retail space. As discussed in the MND, impacts of the Approved Project were determined to be less than significant without the incorporation of mitigation measures.

The Project would not require the demolition of any structures or excavation of dirt beyond what was previously analyzed as part of the Adopted MND. As such, impacts of the Proposed Project on Air Quality as it relates to demolition and excavation would remain less than significant. Construction of the proposed 20,624 square-foot restaurant and 6,000 square feet of commercial retail space was also determined to have less than significant impacts, as discussed in the Adopted MND.

The Project would change the use of the 6,000 square-foot commercial retail space to 1,939 square feet of ground floor restaurant space and 4,061 square feet of hotel lobby and corridor space. In addition to the change of use, the Proposed Project would add 54,282 square feet to the Approved Project for the construction of a 114 guestroom hotel with ancillary uses, as well as the three levels of subterranean parking. As indicated in Table 3.3-6 above, the impacts of the Project would remain less than significant and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Regulatory Compliance

There are several regulatory measures that must be implemented under SCAQMD Rule 403, which governs fugitive dust emissions. These regulations address fugitive dust emissions of PM_{10} and $PM_{2.5}$ that would be regulated by SCAQMD Rule 403, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. It should be noted that *Table 3.3-6* conservatively does not assume the application of BACMs to control fugitive dust.

The regulatory measures would also require that all coatings comply with SCAQMD Rule 1113, which governs the VOC content of coatings.

The Project would comply with Sections 2485 in Title 13 of the California Code of Regulations, which limits the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction to five minutes at any location.

The Project would comply with Section 93115 in Title 17 of the California Code of Regulations, which requires the operation of any stationary, diesel-fueled, compression-ignition engines to meet specified fuel and fuel additive requirements and emission standards.

Operational Phase

The Adopted MND analyzed the operational impacts of the 20,624 square-foot restaurant and 6,000 square feet of commercial retail and determined that impacts were less than significant. The Project would not affect the 20,624 square-foot restaurant which was analyzed as part of the Approved Project and would change the use of the previously analyzed 6,000 square-foot commercial retail space, and add the

operation of a 114 guestroom hotel and three levels of subterranean parking. The hotel would include ancillary uses such as a lobby bar and rooftop bar and dining area. As indicated in Table 3.3-7, the operations of the Project would have less than significant impacts.

The Project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project could add up to 1,227 net vehicle trips to and from the Project Site on a peak weekday at the start of operations in 2020.[21] Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10} and $PM_{2.5}$ emissions (*Table 3.3-7*). As a result, the Project's operational impacts on regional air quality are considered less than significant.

With regard to localized air quality impacts, the Project would emit minimal emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from area and energy sources on-site. As shown in *Table 3.3-7*, these localized emissions would not approach SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. The Project's operational impacts on localized air quality are considered less than significant. The long-term operation of the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality.

Table 3.3-7
Estimated Daily Operations Emissions - Unmitigated

Emissions Source	Pounds Per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	1	<1	<1	<1	<1	<1
Energy Sources	<1	1	1	<1	<1	<1
Mobile Sources	2	9	24	<1	6	2
Net Regional Total	**4**	**10**	**25**	**<1**	**6**	**2**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	**1**	**1**	**1**	**<1**	**<1**	**<1**
Localized Significance Threshold	**-**	**74**	**680**	**-**	**2**	**1**
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning 2017 based on CalEEMod 2016.3.1 model runs. Data in Appendix to this IS/MND. Numbers may not add up due to rounding.

[21] *Traffic Impact Study, Overland Traffic, May 2017.*

Original Baseline

Under the Original Baseline, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Current Baseline

Under the Current Baseline, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

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

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

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. Of the 136 related projects that are potentially under construction concurrent with the Project, several projects are proposed within a two-block radius, including[22]:

- No. 2 – 1600 Schrader, approximately 300 feet from the Project Site, would have 168 hotel rooms and 4,000 square feet of restaurant
- No. 5 – 6516 Selma Avenue, approximately 100 feet from the Project Site, would have 212 hotel rooms, 2,308 square feet cafe, 11,148 square feet restaurant/bar.
- No. 28 – 1541 Wilcox Avenue, approximately 275 feet from the Project Site, a 220-room hotel with 13,004 square feet of restaurants, 1,432 square feet of meeting rooms, and 1,020 square feet of related uses.
- No. 33 – 6417 Selma Avenue, adjacent to the Project Site, would have 180 hotel rooms. This Project is finished construction and expected to be open in summer 2017.

[22] *Traffic Impact Study, Overland Traffic, May 2017.*

- No. 93 – 1525 Cahuenga Boulevard, approximately 350 feet from the Project Site, would have 69 hotel rooms, 1,500 square feet office.

Other potential projects in the area are more than 350 feet away. If any other of these related projects were to undertake construction concurrently with the proposed Project, localized CO, $PM_{2.5}$, PM_{10}, and NO_2 concentrations would be further increased. However, the application of localized significance thresholds (LST) to each cumulative project in the local area would help ensure that each project does not produce localized hotspots of CO, $PM_{2.5}$, PM_{10}, and NO_2. Any projects that would exceed LST thresholds (after mitigation) would perform dispersion modeling to confirm whether health-based air quality standards would be violated. SCAQMD's LSTs recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM_{10} and $PM_{2.5}$ that generally double with every doubling of distance. As such, the cumulative impact of construction projects on local sensitive receptors would be considered less than significant.

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

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

Operation Phase Air Quality Impacts

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the Project's air quality impacts would not exceed SCAQMD's operational thresholds of significance as noted in *Table 3.3-7*, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. SCAQMD's thresholds for ozone precursors ensure that a project's impact will not produce cumulatively considerable emissions that would contribute to regional ozone violations. The Project is a mixed-use project that does not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM_{10} and $PM_{2.5}$ would be minimal. Similarly, existing land uses in the area include commercial land uses that do not produce substantial emissions of localized nonattainment pollutants. A less-than significant project impact does not make a cumulatively considerable contribution to a cumulative impact. Long-term operation of the Project would not result in a cumulatively considerable net increase of any non-attainment criteria pollutant.

Original Baseline

Under the Original Baseline, the Project would not 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, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not 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, and the impacts will be less than significant.

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

Less Than Significant Impact. Construction of the Project could produce air emissions that impact existing and reasonably foreseeable sensitive receptors near the Project Site.

Sensitive Receptors

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

Some receptor sites are the Cosmo Lofts, a multi-story residential complex approximately 350 feet east of the Project Site and residential uses on Schrader Boulevard, approximately 300 feet west of the Project Site. Additional receptors include: Selma Avenue Elementary School (6611 Selma Avenue), approximately 700 feet west of the Site and Selma Park (6567 Selma Avenue), approximately 475 feet west of the Site. As such, these distances are further than the nearby residential uses that are referenced above.

As noted earlier, there are several related projects in the vicinity of the Project Site, including a hotel at 6417 Selma Avenue, adjacent to the Project Site. However, none of these related projects would include potential sensitive receptors associated with long-term exposure (residential).

As illustrated in *Table 3.3-6*, these nearby receptors would not be exposed to substantial concentrations of localized pollutants NO_2, CO, PM_{10} and $PM_{2.5}$ from construction of the Project. Specifically, construction activities would not exceed SCAQMD LSTs and would result in a less than significant impact. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard. Regulatory compliance would require the use of off-road construction equipment and good housekeeping measures that substantially reduce PM_{10} and $PM_{2.5}$ emissions during on-site construction activities.

Operation Phase Air Quality Impacts on Sensitive Receptors

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

Screening analysis guidelines for localized CO hotspot analyses from California Department of Transportation (Caltrans) recommend that projects in CO attainment areas focus on emissions from traffic intersections where air quality may get worse.[23] Specifically, projects that significantly increase the percentage of vehicles operating in cold start mode, significantly increase traffic volumes, or worsen traffic flow should be considered for more rigorous CO modeling. Traffic levels of service at the eight intersections studied in the vicinity of the Project would not be significantly impacted by traffic volumes from the development under existing or 2020 horizon scenarios.[24] In addition, the Project would not significantly increase the percentage of vehicles operating in cold start mode or substantially worsen traffic flow.

Finally, TAC emissions are not expected to be significant, as the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. In addition, 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.[25] The Project is not anticipated to generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities, and any minimal TAC impacts are expected to be less than significant. Long-term operation of the Project would not have any significant impacts on pollutant concentrations at nearby receptors.

Original Baseline

Under the Original Baseline, the Project would not expose sensitive receptors to substantial pollutant concentrations, and the impacts will be less than significant.

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

[24] *Traffic Impact Study, Overland Traffic, May 2017.*

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

Current Baseline

Under the Current Baseline, the Project would not expose sensitive receptors to substantial pollutant concentrations, and the impacts will 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 hotel and commercial uses to the area but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances would regulate any occasional odors associated with on-site uses such as SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations) and Rule 402 (Nuisances).

Original Baseline

Under the Original Baseline, any odor impacts from the Project would be considered less than significant.

Current Baseline

Under the Current Baseline, any odor impacts from the Project would be considered less than significant.

4. BIOLOGICAL RESOURCES

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

D Trees, L. Newman Design Group, Inc., July 21, 2016.

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

No Impact. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife[26] (CDFW) or the U.S. Fish and Wildlife Service (USFWS). The Project Site is located in an urbanized area of the City. The Project Site is zoned C4-2D (Commercial Zone, Height District 2, Development Limitation), and the General Plan land use designation is Regional Center Commercial. The Project Site is developed with a building, subterranean structure, and excavated area. There are four street trees on the City sidewalk along Selma Avenue. These are off-site street trees as part of the City's planting program and not native originating (natural to the location) trees. There are no City or County significant ecological areas.[27] The Project will not result in a taking of nesting native bird species.

Original Baseline

Under the Original Baseline, 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. Accordingly, no impact will occur.

Current Baseline

Under the Current Baseline, 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. Accordingly, no impact will occur.

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[26] *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.*

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

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS were to be adversely modified without adequate mitigation. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site. The nearest riparian habitat is in the Hollywood Hills, north of Hollywood Boulevard and west of La Brea Avenue, classified as Forested/Shrub Riparian and within Wattles Garden Park and Runyon Canyon Park.[28] These habitat areas are approximately 1.25 miles northwest of the Project Site and will not be affected by Project construction or operations.

Original Baseline

Under the Original Baseline, no impact to riparian habitat or sensitive natural community will occur.

Current Baseline

Under the Current Baseline, 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. 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 Freshwater Pond. Additionally, there are wetlands in the Hollywood Hills north of Hollywood Boulevard and west of La Brea Avenue. These are classified as Riverine and Freshwater Forested/Shrub Wetlands and are within Wattles Garden Park and Runyon Canyon Park.[29] These habitat areas are approximately 1.25 miles northwest of the Project Site and will not be affected by Project construction or operations.

Original Baseline

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

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

Under the Original Baseline, 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.

Current Baseline

Under the Current Baseline, the Project will not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. No impact to federally protected wetlands will occur.

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

No Impact. A significant impact would occur if a project would interfere with or remove access to a migratory wildlife corridor or impede the use of wildlife nursery sites. Due to the existing building and excavated area 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. No native wildlife nurseries are located on the Project Site or the adjacent properties.

Original Baseline

Under the Original Baseline, no impacts to migratory wildlife corridors or a native wildlife nursery site will occur.

Current Baseline

Under the Current Baseline, no impacts to migratory wildlife corridors or a native wildlife nursery site will occur.

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

Less Than Significant Impact. A project-related significant adverse effect could occur if a project would cause an impact that is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance. The Project Site is located in an urbanized area of the City. There are no native protected trees in or near the Project Site and no other trees of any kind within the Project Site. There are three magnolia trees located along Selma Avenue parkway whose trunk diameters range from three inches to five inches and therefore are not mature, significant trees. There is one *Washingtonia robusta* (Mexican fan palm) that has an 18-inch trunk diameter but it is located off the Project Site by several feet and will not be impacted by the Project.[30] If the Project were to impact these trees, the Project would comply with the

[30] *Trees, L. Newman Design Group, Inc., July 21, 2016.*

City's regulations regarding tree removal and replacement process: Removal of trees in the public right-of-way requires approval by the Board of Public Works. All trees in the public right-of-way shall be provided or replaced per the current Urban Forestry Division standards.

The Adopted MND included Mitigation Measure 4-1, which would reduce the impact of removing a tree in the right-of-way. The Mitigation Measure would require that removal of the trees receive approval from the Board of Public Works and be consistent with the City's replacement program. With the incorporation of the mitigation measure, impacts of the Approved Project were determined to be less than significant. The Proposed Project does not propose to remove any of the existing trees located within the public right-of-way and would be required to comply with existing regulatory measures as it relates to the removal of the trees located within the public right-of-way. As the removal of trees within the public right-of-way is require to comply with the regulations as enforced by the Urban Forestry Division, the mitigation measure is no longer required to reduce impacts to a less than significant level, and the Project would not conflict with any local policy or ordinance protecting biological resources.

The Project does not propose to remove any of the existing trees located within the public right-of-way and would be required to comply with existing regulatory measures as it relates to the removal of the trees located within the public right-of-way. As the removal of trees within the public right-of-way is require to comply with the regulations as enforced by the Urban Forestry Division, Mitigation Measure 4-1, would no longer be necessary to reduce impacts to a less than significant level. As such the Proposed Project would not conflict with any local policy or ordinance protecting biological resources, and impacts would be less than significant.

Original Baseline

Under the Original Baseline, the Project would not conflict with any local policy or ordinance protecting biological resources. The Approved Project's Mitigation Measure 4-1 is now contained as a standard regulatory process, and would continue to apply to the Project.

Current Baseline

Under the Current Baseline, the Project would not conflict with any local policy or ordinance protecting biological resources. The Approved Project's Mitigation Measure 4-1 is now contained as a standard regulatory process, and would continue to apply to the Project.

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

No Impact. A significant impact would occur if a project conflicts with mapping or policies in any conservation plans of the types cited. The Project Site is located in an urbanized area of the City. Due to the existing urban development on the Project Site and in the adjacent surroundings, there are no known

locally designated natural communities on the Project Site or in the vicinity. There are no City or County significant ecological areas.[31]

Original Baseline

Under the Original Baseline, the Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan. No impact will occur.

Current Baseline

Under the Current Baseline, the Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan. No impact will occur.

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

5. CULTURAL RESOURCES

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

E-1 Archaeology response, South Central Coastal Information Center, May 26, 2016.

E-2 Paleontology response, Los Angeles County Natural History Museum, June 1, 2016.

E-3 Sacred Lands File Search, Native American Heritage Commission, May 19, 2016.

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

No Impact. 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.

Original Baseline

Under the Original Baseline, the Project includes the demolition of three existing buildings (a restaurant, piano bar, and retail/residential building) that were constructed in 1923. The piano bar building and the retail and residential building to be removed were evaluated and determined to have a National Register Historic Places Status Code of 6Z, which, means the resource has been significantly altered and contains little or no integrity.[32] None of the buildings have been identified as requiring Historic Preservation Review.[33] An Intensive Historic Resource Survey in the Hollywood Redevelopment Project Area identified all three buildings on the Project Site as category 6Z[34] (Found ineligible for National Register, California Register or local designation through survey evaluation).[35]

Current Baseline

[32] *http://preservation.lacity.org/files/Hollywood_DPR_Forms_Individual_Resources_6Z_2_of_3.pdf.*

[33] *City of Los Angeles, ZIMAS Parcel profile: http://zimas.lacity.org/.*

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

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

Under the Current Baseline, the Project would construct a building above the existing restaurant building and excavated area at the Project Site, which was constructed in 2016-2017, and would remain as part of the Project.

Therefore, under both the Original and Current Baseline, the Project does not involve the demolition of any historic resources. Therefore, under the Original Baseline and Current Baseline, no impact will occur.

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

Less Than Significant Impact. Section 15064.5 of the 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.

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

Original Baseline

Under the Original Baseline, the Project would require excavation for subterranean parking levels, utility and foundation work, and grading. Thus, there is the potential for buried archeological, prehistoric and historic resources within the Project Site. However, the Project shall comply with the regulatory compliance measure identified below and impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would construct a building above the existing building, to remain, and excavated area at the Project Site. The excavation of the western portion of the Project Site was analyzed as part of the Adopted MND and it was determined that the Approved Project would have less than significant impacts due to compliance with existing regulations. The Project would not require additional excavation for subterranean parking levels, utility and foundation work, and grading, which has already occurred on the Project Site. Therefore, impacts will be less than significant.

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

Less Than Significant Impact. A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site is located in an urbanized area and has been previously disturbed by past development activities.

If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Original Baseline

Under the Original Baseline, the Project would require excavation for subterranean parking levels, utility and foundation work, and grading. Thus, there is the potential for buried paleontological within the Project Site. However, the Project shall comply with the regulatory compliance process and impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would construct a building above the existing building, to remain, and excavated area at the Project Site. The excavation of the western portion of the Project Site was analyzed as part of the Adopted MND and it was determined that the Approved Project would have less than significant impacts due to existing regulatory process. The Project would not require additional excavation for subterranean parking levels, utility and foundation work, and grading, which has already occurred on the Project Site. Therefore, impacts will be less than significant.

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

Less Than Significant Impact. A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Project Site is located in an urbanized area and has been previously disturbed by past development activities.

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

1. Stop immediately and contact the County Coroner:

   1104 N. Mission Road
   Los Angeles, CA 90033
   323-343-0512 (8:00 AM. to 5:00 PM. Monday through Friday) or
   323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

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

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

4. 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.

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

Original Baseline

Under the Original Baseline, the Project would require excavation for subterranean parking levels, utility and foundation work, and grading. Thus, there is the potential for the Project to disturb human remains within the Project Site. However, the Project shall comply with the regulatory compliance process and impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would construct a building above the existing building, to remain, and excavated area at the Project Site. The excavation of the western portion of the Project Site was analyzed as part of the Adopted MND and it was determined that the Approved Project would have less than significant impacts due to existing regulatory measures process. The Project would not require additional excavation for subterranean parking levels, utility and foundation work, and grading, which has already occurred on the Project Site. Therefore, impacts will be less than significant.

6. GEOLOGY AND SOILS

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

F-1 Preliminary Geotechnical Engineering Investigation, GeoConcepts, Inc., November 25, 2014.

F-2 Responsibility Approval Letter, Los Angeles Department of Building and Safety, July 2, 2015 and Soils Report Approval Letter, Los Angeles Department of Building and Safety, December 27, 2014.

In 2015, the California Supreme Court in *Cal. Bldg. Indus. Ass'n v. Bay Area Air Quality Mgmt Dist.* (2015) Cal.4th (*CBIA*), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the *CBIA* decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts:

a) Exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible 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. In 1972, the Alquist-Priolo Special Studies Zones Act (now known as the Alquist-Priolo Earthquake Fault Zoning Act) was passed into law. The Alquist-Priolo Earthquake Fault Zoning 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. The nearest such zone in located to the north for the Hollywood Fault, according to the CGS's final map of the Hollywood Fault released November 6, 2014.[36] The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone.[37] No known active fault is mapped in the Project Site. Based on these considerations, the potential for surface ground rupture at the Project Site is considered low.

Original Baseline

Under the Original Baseline, the Project would not expose people or structures to substantial adverse effects associated with fault rupture, and would not cause or exacerbate seismic conditions on the Project Site. Therefore, impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not expose people or structures to substantial adverse effects associated with fault rupture, and would not cause or exacerbate seismic conditions on the Project Site. Therefore, impacts will 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. The proposed building would be constructed in accordance with the provisions of the latest California Building Code and Los Angeles Building Code (implemented at the time of building permits). This will mitigate the potential effects of strong ground shaking. The design and construction of the Project complies with the most current codes regulating seismic risk, including the California Building Code and the LAMC, which incorporates the International Building Code (IBC) and will minimize the potential to expose people or structures to substantial risk or loss or injury.

Original Baseline

Under the Original Baseline, impacts related to seismic ground shaking will be less than significant.

Current Baseline

Under the Current Baseline, impacts related to seismic ground shaking will be less than significant.

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

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

[37] *ZIMAS search: http://zimas.lacity.org/*

No 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 pore pressure and cyclic loading conditions such as those induced by an earthquake. Liquefaction related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures. The City does not classify the Project Site as located within a liquefaction zone.[38] The Project Site is also not located within a liquefaction hazard zone on the State's Seismic Hazard Zone Map.

Original Baseline

Under the Original Baseline no impacts related to seismic-related ground failure, including liquefaction, will occur.

Current Baseline

Under the Current Baseline no impacts related to seismic-related ground failure, including liquefaction, will occur.

(iv) Landslides?

No Impact. A project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding. A landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow. The City[39] and the General Plan Safety Element[40] do not classify the Project Site as within a landslide area, or identified as a bedrock or probably bedrock landslide site. Further, according to the State of California Seismic Hazards Map[41], the Project Site is not at risk for landslides.[42]

Original Baseline

Under the Original Baseline, no impact related to landslides will occur.

Current Baseline

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[38] *ZIMAS search: http://zimas.lacity.org/.*

[39] *ZIMAS search: http://zimas.lacity.org/.*

[40] *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.*

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

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

Under the Current Baseline, no impact related to landslides will occur.

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

Less Than Significant Impact. 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.

The Project will be built on top of a portion of the buildings described in the Approved Project. The structures on the western portion of the Project Site have already been demolished, excavated, and graded, and therefore, no excavation, grading, or building demolition would occur for the Project.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The entire Project Site is covered by the proposed structure; thus, no exposed areas subject to erosion would be created or affected by the Project. Under the Original Baseline, all on-site grading and site preparation would comply with all applicable provisions of LAMC Chapter IX, Division 70, which addresses grading, excavation, and fills. The grading plan will conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division.

Under the Project Site's current condition, the Project will be built on top of a portion of the buildings described in the Approved Project. The structures on the western portion of the Project Site have already been demolished, excavated, and graded, and therefore, no excavation, grading, or building demolition would occur for the Project. The Adopted MND included Mitigation Measure 6-1, which requires compliance with the recommendations of the Geotechnical Report and Los Angeles Department of Building and Safety (LADBS) approval letter. The mitigation measure for the Approved Project has either been implemented or will be implemented as part of the Adopted MND.

The excavation was analyzed in the Adopted MND. Prior to the issuance of permits for the grading of the Project Site, the Project developer would be required to demonstrate compliance with the above referenced mitigation measure to LADBS. As the western portion of the Project Site has been excavated in compliance with the adopted Mitigation Measure 6-1 in the Adopted MND, no additional excavation for the remaining portion of the subterranean parking is required.

The Project would maintain the proposed three levels of subterranean parking and would change the use of the 6,000 square feet of retail. The change of use of the Project's retail portion would not change the building footprint that was previously analyzed. 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 Project; thus, no exposed areas subject to the erosion would be created or affected by the Project.

During construction, under both the Original and Current Baselines, the Project will be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs).

Original Baseline

Under the Original Baseline, a less than significant impact related to substantial soil erosion or loss of topsoil will occur.

Current Baseline

Under the Current Baseline, no impact related to substantial soil erosion or loss of topsoil will occur.

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 Impact. 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 Project will 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 Project shall comply with the recommendations of the preliminary geotechnical engineering investigation and 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. This was required as part of Mitigation Measure 6-1 of the Adopted MND, and is now considered regulatory compliance.

The Adopted MND determined that impacts would be less than significant with the incorporation of Adopted MND Mitigation Measure 6-1, discussed above under Question 6(b). Additionally, the Project would be constructed partially over an existing building and over an excavated area. The Project Site was graded and excavated in compliance with Mitigation Measure 6-1 incorporated as part of the Adopted MND. The Project would not require any additional grading or excavation beyond what was previously analyzed or already completed

Original Baseline

Under the Original Baseline, the Project would not 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, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not 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, and the impacts will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (decrease in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. The building will comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. Expansive soils were not encountered on the Project Site.[43]

Original Baseline

Under the Original Baseline, a less than significant impact related to expansive soils creating substantial risks to life and property will occur.

Current Baseline

Under the Current Baseline, a less than significant impact related to expansive soils creating substantial risks to life and property will occur.

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, 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.

Original Baseline

Under the Original Baseline, no impacts related to alternative wastewater disposal systems will occur.

Current Baseline

Under the Current Baseline, no impacts related to alternative wastewater disposal systems will occur.

[43] *Page 18, Preliminary Geotechnical Engineering Investigation, GeoConcepts, Inc., November 25, 2014.*

7. GREENHOUSE GAS EMISSIONS

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

C-1 Air Quality and Greenhouse Gases Appendices, DKA Planning, May 2017.

C-2 Original Baseline Air Quality, Greenhouse Gases, and Noise Appendices, DKA Planning, September 2015. (Note: Analyzed the Original Baseline for the Adopted MND).

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

Less Than Significant Impact. The global nature of climate change creates unique challenges for assessing the Project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of GHG across the globe, a single project's impact will be negligible. To further complicate this, there is debate about whether a project's emissions are adding to the GHG emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world.

Climate change analyses are also unique because emitting CO_2 into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO_2 in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a project's incremental contribution of CO_2 into the atmosphere, it is typically not possible to determine whether or how an individual Project's relatively small incremental contribution might translate into physical effects on the environment. Nevertheless, both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Project are discussed in this section.

Pollutant and Effects

Various gases in the Earth's atmosphere, classified as atmospheric GHG, 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. GHG is 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:

- CO_2 is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles

and operation of air conditioning systems. CO_2 comprises over 80 percent of GHG emissions in California.[44]

- Methane (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.[45]

- Nitrous Oxide (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N_2O emissions.[46] N_2O emissions from motor vehicles generally occur directly from operation of vehicles.

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

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

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

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly CO_2, CH_4, N_2O, and HFCs.[47] As shown in *Table 3.7-1*, the other GHGs are less abundant but have higher GWP than CO_2. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as carbon dioxide equivalents (CO_2e). Expressing GHG emissions in CO_2e takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. High GWP gases such as HFCs, PFCs, and SF_6 are the most heat-absorbent.

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

[45] *USEPA, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003).*

[46] *USEPA, U.S. Adipic Acid and Nitric Acid N2O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions, December 2001.*

[47] *CARB, Climate Change Emission Control Regulations, 2004.*

Table 3.7-1
Global Warming Potential For Greenhouse Gases

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

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

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of water supply for the state. According to a California Energy Commission (CEC) report, the snowpack portion of the water supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for California's growing population. Further, the increased ocean temperature could result in increased moisture flux into the State; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

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

with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change.

Regulatory Setting

International

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

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11th session of the Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to 3 degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020, acknowledges that $100,000,000,000.00 is needed each year to enable countries to adapt to climate change. The agreement would be signed into law on April 22, 2016 and would require ratification by 55 countries representing 55 percent of emissions.

The Western Regional Climate Action Initiative (WCI). The WCI is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007,

it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The CARB's planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

Federal

The USEPA has historically not regulated GHG emissions because it determined the CAA did not authorize it to regulate emissions that addressed climate change. In 2007, the United States Supreme Court found that GHG emissions could be considered within the CAA's definition of a pollutant.[48] In December 2009, USEPA issued an endangerment finding for GHG emissions under the CAA, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration (NHTSA) and USEPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon. In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding $8,000,000,000.00 in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, invests in renewable energy sources, calling for adaptation programs, and leading international efforts to address climate change.

USEPA also has adopted standards that set a national limit on GHG emissions produced from new, modified, and reconstructed power plants, and has issued the Clean Power Plan, which is targeted toward the reduction of carbon emissions from existing power plants. Under the Clean Power Plan, the USEPA set state-specific interim and final performance rates for two subcategories of fossil fuel-fired electric generation units: fossil fuel-fired electric steam generating units and natural gas-fueled combined cycle generating units. The Clean Power Plan requires states to develop and implement plans that ensure that the power plants in their state – individually, together or in combination with other measures – achieve the interim performance rates over the period of 2022 to 2029 and the final performance rates, rate-based goals or mass-based goals by 2030. In February 2016, the United States Supreme Court stayed implementation of the Clean Power Plan pending judicial review.

Vehicle Standards. Other regulations have been adopted to address vehicle standards including the USEPA and NHTSA joint rulemaking for vehicle standards.

Energy Independence and Security Act (EISA). Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

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

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

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

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

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

State

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

Executive Order S-3-05. On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency formed a Climate Action Team (CAT) that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The CAT reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in Executive Order S-3-05.[49] Furthermore, the report provided to Governor Schwarzenegger in 2006 indicated that smart land use and increased transit availability should be a priority in the State of California.[50] According to the CAT, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Assembly Bill 32. In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that

[49] *California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.*

[50] *California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.*

CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, CARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[51] 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 SF_6 emissions from the non-electricity sector. CARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons (MT) of CO_2 per year and make up 94 percent of the point source CO_2 emissions in California.

CARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by CARB in coordination with the CAT, was first published in October 2008 (the 2008 Scoping Plan). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the State's dependence on oil, diversify the state's energy sources, save energy, create new jobs, and enhance public health. It accommodated the State's projected population growth. Moreover, it expressly encouraged called for coordinated planning of growth, including the location of dense residential projects near transportation infrastructure, including public transit.

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.

In order to assess the scope of reductions needed to return to 1990 emissions levels, CARB first estimated the 2020 "business-as-usual" (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 MT, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 MT (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the 2008 Scoping Plan, CARB approved a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping

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

Plan).[52] CARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.[53] Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent) to achieve 1990 levels.

On May 22, 2014, CARB approved its firsts update to the AB 32 Scoping Plan (First Update), recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 million metric tons (MMT) CO_2e 1990 emissions level would be slightly higher than identified in the original Scoping Plan, at 431 $MMTCO_2e$. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the First Update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 $MMTCO_2e$ or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. CARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors. [54, 55]

As shown in *Table 3.7-2*, these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program. Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including CARB, Public Utilities Commission (PUC), High Speed Rail Authority, and CEC. The few actions that are directly or indirectly associated with local government control are in the Transportation sector, which is charged with reducing 4.5 percent of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

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

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

[54] *CARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 (recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles").*

[55] *CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.*

Table 3.7-2
Emission Reductions Needed To Meet AB 32 Objectives In 2020

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

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

Executive Order B-30-15. On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State's GHG targets with those set in October 2014 by the European Union and is intended to help the State meets its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs the CARB to update the Climate Change Scoping Plan. A recent study shows that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.[56]

Cap And Trade. CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed

[56] *Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172).*

"covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration. Under the Cap-and-Trade Program, covered entities that emit more than 25,000 $MTCO_2e$ per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR). CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures. As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

While the 2020 cap would remain in effect post-2020,[57] the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.[58] However, CARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The "recommended action" in the First Update for the Cap-and-Trade Program is: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target."[59] The "expected completion date" for this

[57] *California Health & Safety Code § 38551(a) ("The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.").*

[58] *See AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.*

[59] *CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 98 (May 2014).*

recommended action is 2017.[60] It is therefore reasonable to assume that the Cap-and-Trade Program will extend beyond 2020.

SB 1368. SB 1368, requires the PUC and the CEC to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

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

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

SB 375. On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPOs) to prepare a SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375

[60] *Id.*

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.[61]

On October 24, 2008, CARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). CARB's preliminary proposal consisted of a quantitative threshold of 7,000 $MTCO_2e$ per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, CARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.[62] There is currently no timetable for finalized thresholds.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.[63] For the area under the SCAG's jurisdiction—including the Project Site — CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035. On February 15, 2011, the CARB's Executive Officer approved the final targets.[64]

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

California Green Building Standards. The California Green Building Standards Code, which is Part 11 of the California Code of Regulations , is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout

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

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

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

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

California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The updated 2016 CALGreen Code became effective January 1, 2017.

Regional

SCAQMD. SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working Group) to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where SCAQMD is the lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 $MTCO_2e$ as a screening numerical threshold for stationary sources. SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions that recommended a screening threshold of 3,500 $MTCO_2e$ for residential projects, 1,400 $MTCO_2e$ for commercial projects, and 3,000 $MTCO_2e$ for mixed use projects. Additionally, the Working Group identified project-level efficiency target of 4.8 $MTCO_2e$ per service population as a 2020 target and 3.0 $MTCO_2e$ per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 $MTCO_2e$ and the plan-level target for 2035 was 4.1 $MTCO_2e$. SCAQMD has not established a timeline for formal consideration of these thresholds.[65] In the meantime, the project level thresholds are used as a non-binding guide. SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the Project.

SCAG RTP/SCS. On April 7, 2016, SCAG adopted its 2016-2040 Regional Transportation Plan Sustainable Communities Strategy (the RTP/SCS update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The RTP/SCS calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having ZEVs, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040. The RTP/SCS also includes a number of measures designed to reduce the potential of development to conflict with AB 32 or any

[65] *SCAG, Final PEIR for the 2016-2040 RTP/SCS, Appendix G. Accessible at http://rtpscs,scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf.*

other plan designed to reduce GHG.[66] These measures are particularly important where streamlining mechanisms under SB 375 are utilized.

Local (City of Los Angeles)

Green LA Plan. In May 2007, the City released its Green LA Plan that sets a goal to reduce the generation of GHG emissions 35 percent below 1990 levels by 2030. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos. This Plan included goals for energy, water, transportation, land use, waste, port, airport, and related sources.

ClimateLA Implementation Plan. To implement the Green LA Plan, the City published "ClimateLA", which included a baseline GHG emissions inventory for the City, identified enforceable strategies, and provided a means to monitor and report on progress toward the 2030 goal of reducing GHG emissions by 35 percent from 1990 levels. To achieve these goals, the City developed goals, including the following:

- Green Building: The program includes a goal calling for the City to be a worldwide leader in green buildings. Action E6 calls for a comprehensive set of green building policies to guide and support private sector development.

- Energy: Increase the amount of renewable energy provided by the Los Angeles Department of Water and Power (LADWP), present a comprehensive set of green building policies to guide and support private sector development, reduce energy consumed by City facilities, utilize solar heating where applicable, and help citizens to use less energy.

- Waste: Reduce or recycle 70 percent of trash by 2015.

- Open Space and Greening: Create 35 new parks, revitalize the Los Angeles River to create open space opportunities, plant 1,000,000 trees, and identify opportunities to "daylight" streams, identifying promising locations for stormwater infiltration to recharge groundwater aquifers, and collaborate with schools to create more neighborhood parks.

Mobility 2035 Plan. On January 20, 2016, the City adopted its Mobility 2035 Plan (Mobility Plan), the Circulation Element of its General Plan. The Mobility Plan focuses on developing a multi-modal transportation system that can address the City's mobility needs through 2035. The Mobility Plan calls for strategies that advance five goals: 1) Safety First, 2) World Class Infrastructure, 3) Access for All Angelinos, 4) Collaboration, Communication, and Informed Choices, and 5) Clean Environments and Healthy Communities. While the Mobility Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. It includes a key strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in

[66] *Southern California Association of Governments, Final PEIR, 2016-2040 RTP/SCS, Chapter 3.8*

GHG from reductions in vehicle miles traveled. As such, the Mobility Plan's call for integrated land use planning, clean fuel vehicles are consistent with State and regional plans calling for more compact growth in areas with transportation infrastructure.

Green Building Ordinance. The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.[67] Larger projects must meet the equivalent of the certification at the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification generally ensures that projects exceed Title 24 standards by at least 10 percent.[68] The City's ordinance affects the following types of development:[69]

1. New non-residential building or structure of 50,000 gross square feet or more of floor area;

2. New mixed-use or residential building of 50,000 gross square feet or more in excess of six stores;

3. New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;

4. The alternation or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;

5. The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building; and

6. The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new non-residential and high-rise residential buildings, including:

Section 99.04.304.1. Irrigation Controllers. When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change; and

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

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

[69] *Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.*

2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input. Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers that meet the criteria in Section 99.04.304.1.

Section 99.04.303.4. Wastewater Reduction. Each building shall reduce by 20 percent wastewater by one of the following methods:

1. The installation of water conserving fixtures (water closets, urinals); or

2. Utilizing non-potable water systems (captured rainwater, graywater, and municipally treated wastewater) complying with the current edition of the Los Angeles Plumbing Code or other methods.

Section 99.04.304.2. Outdoor Potable Water. Building on sites with 1,000 square feet or more of cumulative landscaped areas shall have separate meters or submeters for indoor and outdoor potable water use.

Section 99.04.304.3. Irrigation Design. Buildings on sites with 1,000 square feet or more of cumulative irrigated landscaped areas shall have irrigation controllers and sensors which include the following criteria and the manufacturer's recommendations.

Section 99.05.407.1. Weather Protection. Provide a weather-resistant exterior wall and foundation envelope as required by the Los Angeles Building Code section 1403.2 (Weather Protection) and California Energy Code Section 150, manufacturer's installation instructions, or local ordinance, whichever is more stringent.

Section 99.05.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent. Comply with Section 66.32 et seq. of the LAMC.

Section 99.05.408.4. Excavated Soil and Land Clearing Debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project and when approved by the LADWP, such material may be stockpiled on site until the storage site is developed.

Section 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

Section 99.05.504.3. Covering of Duct Openings and Protection of Mechanical Equipment During Construction. At the time of rough installation, or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheetmetal or other methods acceptable to the LADWP to reduce the amount of dust or debris which may collect in the system.

Section 99.05.504.4.6. Resilient Flooring Systems. For 50 percent of floor area receiving resilient flooring, install resilient flooring complying with the VOC-emission limits defined in the 2009 Collaborative for High Performance Schools criteria and listed on its Low-emitting Materials List or certified under the Resilient Floor Covering Institute FloorScore program.

Existing Emissions

The Project Site contains commercial/restaurant space under the Current Baseline. As shown in *Table 3.7-3*, the existing development at the Project Site generates about 3,759 $MTCO_2e$ annually, with the majority of emissions generated by mobile sources traveling to and from the Project Site.

The emission impacts due to the Original Baseline were analyzed in the Adopted MND (ENV-2015-2672-MND) for the CUB Approval. The results of the analysis are incorporated by reference.

Table 3.7-3
Existing Annual CO2e Greenhouse Gas Emissions

Scenario and Source	CO_2e
Area Sources	<1
Energy Sources	849
Mobile Sources	2,837
Waste Sources	11
Water Sources	61
Total Emissions	3,759
Metric tons per year	

Methodology

The methodology utilized for this analysis is based on a Technical Advisory released by the OPR on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the RPS of 33 percent, the AB 1493 regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and

industry-specific activities.[70] The Climate Registry General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."[71] Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the Climate Registry General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the Climate Registry General Reporting Protocol's reporting requirements. The Climate Registry General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.

Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).[72]

The Climate Registry General Reporting Protocol provides a range of basic calculations methods. However, the Climate Registry General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to ARB to be considered for future strategies.[73] For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the OPR has noted that lead agencies "should make a good-faith effort, based on available information, to calculate, model, or estimate… GHG emissions from a project, including the

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[70] *California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed March 2, 2015.*

[71] *Ibid.*

[72] *Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.*

[73] *California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed March 2, 2015.*

emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[74] Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's CalEEMod. Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[75]

Significance Criteria

CARB, SCAQMD and the City have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.[76] As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHG were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would:

a. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHG. It urges the quantification of GHG emissions where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. It also recommends considering other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which a project complies with regulations or requirements adopted to implement a reduction of GHG). Further, it states that:

- A lead agency should consider the following factors, among others, when assessing the significance of GHG emissions on the environment:

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[74] *OPR Technical Advisory, p. 5.*

[75] *See www.caleemod.com.*

[76] *The South Coast Air Quality Management District formed a GHG Significance Threshold Working Group. Information on this Working Group is available at*

- The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

- Whether a project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

- The extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The current CEQA Guidelines do not establish a threshold of significance. Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA Guidelines were amended in response to SB 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[77] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."[78] Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.[79]

Although GHG emissions can be quantified, as stated previously, CARB, SCAQMD and the City, have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.[80]

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[77] *See www.caleemod.com.*

[78] *See www.caleemod.com.*

[80] *The South Coast Air Quality Management District formed a GHG Significance Threshold Working Group. Information on this Working Group is available at*

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[81]

Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan
- SCAG's SCS; and
- Appropriate transportation and air quality plans from the City, including the Green Building Ordinance, ClimateLA Implementation Plan, and Mobility Plan.

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 and vendors traveling to and from the Project Site. These impacts would vary day to day over the 15-month duration of construction activities. As illustrated in *Table 3.7-4*, construction emissions of CO_2 would peak in 2018, when up to 480 $MTCO_2e$ per day are anticipated following implementation regulatory compliance. These emissions are further incorporated in the assessment of long-term operational impacts by amortizing them over a 30-year period, pursuant to guidance from the State and SCAQMD.

Table 3.7-4
Estimated Construction Emissions - Unmitigated

Construction Year	CO_2	CH_4	N_2O	CO_2e
2018	479	<1	0	480
2019	152	<1	0	152

Pounds per day
Source: DKA Planning, 2017 based on CalEEMod 2016.3.1. Data in Appendix to this IS/MND.

[81] *CEQA Guidelines § 15064(h)(3).*

Operation

GHG emissions were calculated for long-term operations. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period, as discussed above. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the RPS of 33 percent, the AB 1493 regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the LCFS.

This analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures (i.e., the No Action Taken [NAT] Scenario). This approach mirrors the concepts used in the CARB's Scoping Plan for the implementation of AB 32. This methodology is used to analyze whether a project would impede compliance with California's GHG reduction plans and policies.

The analysis in this section includes potential emissions under NAT Scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the Scoping Plan that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

The NAT Scenario is used to establish a comparison with Project-generated GHG emissions. The NAT Scenario does not consider site-specific conditions, Project design features, or prescribed mitigation measures. As an example, a NAT Scenario would apply a base Institution of Transportation Engineers (ITE) trip-generation rate for the Project and would not consider site-specific benefits resulting from the proposed mix of uses or close proximity to public transportation. The analysis below establishes NAT Scenario as complying with the minimum performance level required under Title 24. The NAT Scenario also considers state mandates that were already in place when CARB prepared the Supplemental FED (e.g., Pavley I Standards, full implementation of California's Statewide RPS beyond current levels of renewable energy, and the California LCFS).

Emissions calculations for the Project include credits or reductions for the regulatory compliance such as reductions in energy or water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project generated trips as a result of project features will provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent.

As shown in *Table 3.7-5*, the emissions for the Project and its associated CARB 2020 NAT Scenario are estimated to be 1,979 and 2,980 MT CO_2e per year, respectively, which shows the Project will reduce emissions by 34 percent from the CARB 2020 NAT Scenario. The proposed emissions would represent a net 3,277 MT increase in annual emissions when accounting for existing emissions from current

development. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan.

Table 3.7-5
Estimated Annual CO_2e Greenhouse Gas Emissions

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	<1	<1	-	0%
Energy Sources	1,201	696	-504	-42%
Mobile Sources	1,668	1,171	-497	-30%
Waste Sources	45	45	-	0%
Water Sources	46	46	-	0%
Construction	21	21	-	0%
Total Emissions	2,980	1,979	-1,001	-34%

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.
** NAT Scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), LCFS (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's RPS (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*
Source: DKA Planning, 2017.

The analysis in this MND uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to evaluate the Project's impact (i.e., 15.3 percent reduction from NAT Scenario). The report's methodology is to compare the Project's emissions as proposed to the Project's emissions if the Project were built using a NAT Scenario approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if it was constructed with project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT Scenario comparison based on the Scoping Plan is appropriate because the Project would contribute to statewide GHG reduction goals. Specifically, the Project's mixed-use nature and location in an existing urban setting provide opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and vehicle miles traveled that no longer are made. Second, it would eliminate many vehicle trips because travel to and from the Project Site could be captured by public transit and pedestrian travel instead. Finally, it would attract existing trips on the street network that would divert to the proposed uses.

As illustrated in *Table 3.7-6*, the Project's profile as an urban infill project with proximity to substantial public transit will produce substantial reductions over land uses that are located in a more typical

community that has not coordinated its land use and transportation planning. The projected reductions in vehicle trips and vehicle miles traveled (VMT) would range from 0-50 percent in reductions from the internal capture of hotel visitors and up to 20 percent reductions from pass-by trips. These would result in concomitant reductions in CO_2e emissions that far exceed the State's AB 32 Scoping Plan goal of a 4.5 percent reduction from the overall transportation sector by 2020. As such, this analysis concludes that the Proposed Project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decisionmaking.

Table 3.7-6
Daily Vehicle Travel Reductions Associated with Project

Land Use	Reduction from Internal Capture	Reduction from Pass-By Trips	Reduction from Transit/Walk-In Trips
Sit-Down Restaurant	50%	20%	0%
Quality Restaurant	50%	10%	0%
Source: Table 2, Traffic Impact Analysis, Overland Traffic Consultants, Inc., May 2017.			

It should be noted that each source category of GHG emissions from the Project is subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

- *Stationary and area sources*. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap-and-Trade Program.

- *Transportation*. Both construction and operational activities from the Project Site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap-and-Trade Program.

- *Energy Use*. Both construction and operational activities from the Project Site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.

- *Building structures*. Operational efficiencies will be built into the project that reduce energy use and waste, as mandated by the LAGBC.

- *Water and wastewater use*. The Project would be subject to drought-related water conservation emergency orders and related State Water Resources Control Board (SWRCB) restrictions.

- *Major appliances*. The Project would include major appliances that are regulated by CEC requirements for energy efficiency.

- *Solid waste management.* The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

In addition to the GHG emission reductions described above, it is important to note that the CO_2 estimates from mobile sources (particularly CO_2, CH_4, and N_2O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHG 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 Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the 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.

As described throughout this analysis, the Project would comply with regulatory measures that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT Scenario. Thus, the Project's emissions reductions as compared to the NAT Scenario demonstrate consistency with GHG Reduction Plans, Executive Orders S-3-05 and B-30-15, SCAG's SCS, and the City's Green Building Ordinance. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant.

The Adopted MND analyzed the potential impacts of the Approved Project and determined that Project-specific impacts related to the indirect or direct emission of GHG would be less than significant. The results of the analysis are incorporated by reference. The Project would not affect the continued operation of the existing restaurant that was previously analyzed in the Adopted MND. As indicated in Table 3.7-4 and 3.7-5, impacts of the Project would be less than significant.

Original Baseline

Under the Original Baseline, Project-specific impacts related to the indirect or direct emission of GHG will be less than significant. The emission impacts due to the Original Baseline were analyzed in the Adopted MND for the Approved Project. Impacts would be less than significant. The results of the analysis are incorporated by reference.

Current Baseline

Under the Current Baseline, Project-specific impacts related to the indirect or direct emission of GHG will be less than significant.

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. As noted earlier, the Project would be consistent with a number of relevant plans and policies that govern climate change.

Consistency with Executive Orders S-03-05 and B-30-15

The Project is consistent with the State's Executive Orders S-3-05 and B-30-15, which are orders from the state's Executive Branch for the purpose of reducing GHG emissions. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is a mixed-used development located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro and other transit providers.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the state's achievement of that goal and it is reasonable to expect the Project's emissions profile to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at build-out presented in this analysis represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the state's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with EO S-03-05 horizon-year goal.

Many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "…for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in CARB's First Update to the AB 32 Scoping Plan.[82, 83] As such, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Orders S-3-05 and B-30-15.

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[82] *CARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 (recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles").*

[83] *CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.*

Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. *Table 3.7-7* evaluates the Project's consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan. The Project is consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors:

- **Energy Sector:** Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the state's zero net energy building goals, would serve to reduce the Project's emissions level.[84] Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[85]

- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.[86]

- **Water Sector:** The Project's emissions level will be reduced as a result of further desired enhancements to water conservation technologies.[87]

- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project's emissions level.[88]

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

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	**Not Applicable.** The statewide program is not relevant to the Project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with	**Not Applicable.** The development of standards is not relevant to the Project.

[84] *CARB, First Update, pp. 37-39, 85, May 2014.*

[85] *CARB, First Update, pp. 40-41, May 2014.*

[86] *CARB, First Update, pp. 55-56, May 2014.*

[87] *CARB, First Update, p. 65, May 2014.*

[88] *CARB, First Update, p. 69, May 2014.*

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

Strategy	Project Consistency
long-term climate change goals.	
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 LADWP, which is subject to the RPS has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Not Applicable.** The statewide program is not relevant to the Project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	**Not Applicable.** The development of regional planning goals is not relevant to the Project.
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not Applicable.** State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Neutral.** The Project may or may not include solar roofs.
Medium/Heavy-Duty Vehicles. Adopt medium and 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.

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

Strategy	Project Consistency
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** Under City's requirements, the Project would divert/recycle at least 50 percent of construction debris, re-use existing materials in new construction, use recycled content materials; and recycle during operation.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not Applicable.** Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent**. The Project will be compliant with the City's Green Building Ordinance, would incorporate water saving features and energy efficient fixtures into its design.
Agriculture. In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not Applicable.** The Project does not include agricultural facilities.
Source: CAJA Environmental Services, 2017.	

Consistency with SCAG's 2016-2040 RTP/SCS

At the regional level, the 2016 RTP/ SCS represent the region's Climate Action Plan that defines strategies for reducing GHG emissions. In order to assess the Project's potential to conflict with the 2016 RTP/SCS, this section analyzes the Project's land use profile for consistency with those in the SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The Project is an infill development that is also consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the Project Site's location near substantial local transit bus services places it in a HQTA. Metro lines 212/312, 217, 222 and DASH Hollywood at the intersection of Cahuenga and Hollywood, are approximately 650 feet north of the Project Site. The 2016 RTP/SCS projects that these areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth. Further, the vertical integration of land uses on the Project Site will produce substantial reductions in auto mode share to and from the Project Site that will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the RTP/SCS. Further, the inclusion of electric vehicle charging infrastructure will support the penetration of electric ZEVs into the vehicle fleet.

Table 3.7-8 demonstrates the Project's consistency with the Actions and Strategies set forth in the 2016 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2016 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016 RTP/SCS.

Table 3.7-8
Project Consistency With SCAG 2016 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis [a]
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	**Consistent.** The Project Site under the Current Baseline does not contain housing that would be displaced. The Original Baseline includes four units, which is a negligible amount that would not displace a substantial number of people.
Focus new growth around transit.	Local Jurisdictions	**Consistent.** The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	**Consistent.** The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing along the 2,980 miles of Livable Corridors in the region.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	**Consistent.** The Project would help further jobs/housing balance objectives that can improve the use of Neighborhood Electric Vehicles for short trips. The project is also generally consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	**Not Applicable.** While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	**Consistent.** The Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
Transportation Strategies		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy calls on investing in the maintenance of our existing transportation system, the Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation	County Transportation Commissions Local Jurisdictions	**Consistent.** The Project is an infill development that will minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs.

Table 3.7-8
Project Consistency With SCAG 2016 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis [a]
Systems Management strategies.		
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG Local Jurisdictions	**Not Applicable.** While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the Project would not interfere with these emerging programs.
Source: Southern California Association of Governments; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016.		

Consistency with the City of Los Angeles ClimateLA Implementation Plan

Construction of the Project would generally be consistent with the ClimateLA Implementation Plan, including its goal of making the City a worldwide leader in green buildings. Specifically, compliance with the City's LEED-based requirements will produce energy savings for construction projects that is envisioned in the implementation of Action E6 (present a comprehensive set of green building policies to guide and support private sector development). Therefore, the Project would result in a less-than-significant impact related to construction GHG emissions.

Construction of the Project is consistent with the ClimateLA's goal of reducing or recycling 70 percent of trash (including construction waste) by 2015. The Project would promote this goal by complying with

waste reduction measures mandated by CALGreen Code and LAGBC, as well as solid waste diversion policies administered by CalRecycle that in turn reduce GHG emissions.

Long-term operations of the Project is also consistent with the ClimateLA focus on transportation, energy, water use, land use, waste, open space and greening, and economic factors to achieve emissions reductions.

With regard to transportation, the Project is consistent with the 2016 AQMP focus on reducing emissions from private vehicle use. Specifically, the Project Site's infill location with immediate access to significant public transit, pedestrian, and bicycle facilities results in a transit-oriented development that will reduce auto dependence. Further, the mixed-use nature of the Project is consistent with the 2016 AQMP land use policies that promote high density near transportation, TOD, and making underutilized land available for housing and mixed-use development, especially when near transit.

To reduce emissions from energy usage, the Project would be consistent with ClimateLA and its focus on increasing the amount of renewable energy provided by the LADWP; presenting a comprehensive set of green building policies to guide and support private sector development; and helping citizens to use less energy. Both construction and operational activities from the Project Site would generate energy-related emissions that are reduced by the state's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030.

With regard to water, the Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City's water and wastewater integrated resources plan that will increase conservation, and maximize the capture and reuse of storm water. Specifically, the Project would be subject to drought-related water conservation emergency orders and related SWRCB restrictions, as well as CALGreen and LAGBC that call for water-conserving fixtures and processes. These elements of the Project would be consistent with goals set forth in the ClimateLA Implementation Plan.

With regard to waste, the Project would be consistent with the ClimateLA goal of reducing or recycling 70 percent of trash by 2015. Operational efficiencies will be built into the Project that reduce energy use and waste, as mandated by the LAGBC and CALGreen Code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Project would not interfere with ClimateLA and its focus on creating 35 new parks; revitalizing the Los Angeles River to create open space opportunities; planting 1,000,000 throughout the City; identifying opportunities to "daylight" streams; identifying promising locations for stormwater infiltration to recharge groundwater aquifers; and collaborating with schools to create more parks in neighborhoods.

Consistency with the City of Los Angeles Green Building Ordinance

The Los Angeles Green Building Ordinance requires that all projects filed on or after January 1, 2017 comply with the LAGBC as amended to comply with the 2016 CALGreen Code. Mandatory measures under the City's Green Building Ordinance that would help reduce GHG emissions include short- and long-term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the City's Green Building Ordinance includes measures that would increase energy efficiency on the Project Site, including installing Energy Star rated appliances and installation of water-conserving fixtures. Therefore, the Project is consistent with the City's Green Building Ordinance.

The Project will comply with the City's Green Building Ordinance standards that compel LEED certification, reduce emissions beyond a BAU 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 LAGBC, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development.

Consistency with the City of Los Angeles Mobility 2035 Plan

While the Mobility Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The Project is fully consistent with these general objectives as it is an infill project, near public transit that would be a low VMT project. Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles.

Cumulative Impacts

The emission of GHGs by a single project into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as energy, mobile, and construction, are source categories targeted for emission reductions by the Cap-and-Trade Program.

Currently, there are no quantitative CARB, SCAQMD, or City significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced

emissions. Therefore, consistent with CEQA Guidelines Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change will be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions; Executive Orders S-3-05 and B-30-15; the RTP/SCS; and the City's policies (e.g., Green Building Ordinance, Mobility Plan, ClimateLA).

Compliance regulatory measures, including state mandates, would contribute to GHG reductions. These reductions represent a reduction from NAT Scenario and support state goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the CARB's Scoping Plan for the implementation of AB 32. The Project is consistent with the approach outlined in CARB's Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan, the Project would use "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen Code.

As part of SCAG's 2016RTP/SCSRTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by CARB. The Project results in significant VMT reduction in comparison to NAT Scenario and would be consistent with the 2016 RTP/SCS. The Project also would comply with the LAGBC, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. Regulatory compliance would advance these objectives. Further, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., LAGBC). Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 22 percent reduction in GHG emissions from NAT Scenario. The Project's GHG reduction measures make the Project consistent with AB 32.

The Project would also be consistent with applicable land use policies of the City and SCAG's 2016 RTP/SCS pertaining to air quality, including reducing GHG emissions. As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. The NAT Scenario comparison demonstrates the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap-and-Trade Program, that Program will indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met.

Thus, given the Project's consistency with state, SCAG, and City GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable.

Original Baseline

Under the Original Baseline, the Project would not conflict with applicable plans, policies and/or regulations adopted for the purpose of reducing the emissions of GHGs, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not conflict with applicable plans, policies and/or regulations adopted for the purpose of reducing the emissions of GHGs, and the impacts will be less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

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

G-1 Phase I Environmental Site Assessment, Partner Inc., September 26, 2014.

G-2 Phase II Subsurface Investigation Report, Partner Inc., November 4, 2014.

In 2015, the California Supreme Court in *CBIA*, *surpa*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the *CBIA* decision, the Project would have a significant impact related to hazards and hazardous materials if it would result in any of the following impacts:

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 will be less than significant.

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

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

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

The transport of hazardous materials and wastes (i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils), if they occur at all in connection with either Project construction or operations, 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, the potential impacts associated with the minimal transport of any hazardous material will be less than significant.

Original Baseline

Under the Original Baseline, the Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials, and the impacts will 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 Impact. 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.

Recognized Environmental Condition

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

- According to the regulatory database report, historical resources and building department records, the property identified as 1600 and 1604 Wilcox Avenue was historically developed with a gasoline station and automobile muffler installation facility from 1926 to 1966. According to building records, a permit for a service station on a vacant lot was issued in 1926 and a permit for a garage for automobile greasing was issued in 1927 to William Ellenbeck. A permit for a pump and canopy was issued to The Texas Co. in 1941. No information pertaining to the exact location, installation or removal dates, tank capacity or construction was available during the course of this assessment. No records were on file with the Los Angeles County Public Health Investigation (LACPHI), the Los Angeles Fire Department (LAFD) Underground Storage Tank (UST) Division and the LAFD Hazardous Materials (HazMat) Division for information pertaining to hazardous substances, USTs, releases, inspection records, etc. for the subject property; and no information regarding this facility was provided by subject property management. Based on the lack of information regarding the former gasoline station, the historical use of the property as a gasoline service station represents a REC.

- Additionally, the property identified as 6421 Selma Avenue has been occupied by various automobile body and repair tenants including Barlow Auto Parts and Barlow Motor Supply Co (at least 1960); Academy Auto Body Inc. (at least 1970); All Auto Body Co (from at least 1975 to at least 1988); Hollywood Auto Body (from at least 1993 to at least 2004; and Network Auto Body (from at least 2006 to 2014). According to a building permit dated 1953, the subject property was used a repair garage for 27 years prior (since original construction in 1926). These types of operations generally involve the storage, use and generation of significant quantities of petroleum products and other hazardous materials. According to records reviewed from the AQMD, the subject property was granted several permits to operate (PTOs) spray booth equipment, including the use of unspecified solvents. All Auto Body, Facility ID No. 15161, was permitted to operate one spray booth in 1980. Hollywood Auto Body, Facility ID No. 86124 and 134210, was permitted to operate two spray booths in 1992 and 2002. Network Auto Body, Facility ID No. 147020, was permitted to operate one spray booth in 2006. All permits are listed as inactive. No evidence of the former spray booths was observed during on-site reconnaissance. No other information regarding the historical operations and hazardous materials generated, stored and used on-site were found during Partner's assessment.

- According to records reviewed from the Hazardous Waste Tracking System (HWTS) online database, the former tenant identified as Hollywood Auto Body Center is listed in the Hazardous Waste

Tracking System (HWTS) under EPA ID No. CAL000049169. This facility generated 1.43 tons of unspecified solvent mixture in 2005. This facility was listed inactive on June 30, 2006. The former tenant identified as Network Auto Body is listed under EPA ID No. CAL000307733. This facility generated 2.08 tons of aqueous solution with organic residues less than 10 percent between the years 2008 and 2013. No other pertinent information is provided. In addition, during the on-site reconnaissance, a drain was observed in the center of the building. No significant stains were observed in the areas of the drains; and no evidence of the improper discharge of hazardous materials or petroleum products was apparent. No storage of hazardous materials or petroleum products appeared present near the drains.

- Although no specific areas of concern (such as USTs or other subsurface features at 6421 Selma Avenue) have been identified; the potential for the subject property to have been adversely impacted by long-term use for environmentally sensitive purposes cannot be ruled out without further investigation; therefore, this former use represents a REC.

Controlled Recognized Environmental Conditions

A controlled recognized environmental condition (CREC) refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. The following was identified during the course of the Phase I Environmental Site Assessment (Phase 1):

- No CRECs were identified during the course of the Phase I.

Historical Recognized Environmental Condition

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

- No HRECs were identified during the course of the Phase I.

Existing Setting

The Original Baseline contains an excavated area, an existing 3,174 square foot restaurant, an existing 1,650 square foot piano bar, and an existing 4,893 square foot building with vacant retail space on the ground floor and four residential units on the second floor.

Under the Current Baseline, the Project would construct a building above the existing building, to remain, on the eastern portion of the Project Site and excavated area on the western portion of the Project Site.

Conclusions, Opinions and Recommendations

The Phase I has revealed evidence of recognized environmental conditions and environmental issues in connection with the subject property. Based on the conclusions of this assessment, the following was recommended:

1. A limited subsurface investigation should be conducted in order to determine the presence or absence of soil and/or groundwater contamination due to the historical use of the subject property.

2. An Operations and Maintenance (O&M) Program should be implemented in order to safely manage the suspect asbestos containing materials (ACMs) located at the subject property.

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

4. The sources of water intrusion should be repaired and water damaged building materials (e.g., ceiling tiles, and possibly other building components that could not be observed during the course of Phase I) should be removed and replaced as part of routine maintenance to prevent the potential for microbial proliferation.

Subsurface Investigation

A Phase II Subsurface Investigation (Phase II) was conducted at the Project Site to investigate the potential impact of petroleum hydrocarbons (PHCs) and/or VOCs to soil and/or groundwater as a consequence of a release or releases from the former gasoline service station and former automotive repair businesses. The scope of the Phase II included a geophysical survey and six borings. Six soil samples were analyzed for Total Petroleum Hydrocarbons – Carbon Chain (TPH-cc) and VOCs. None of the samples exhibited discoloration or an odor and none of the photoionization detector (PID) readings suggested the presence of elevated volatile organics concentrations. Groundwater was not encountered to a maximum depth of 37 feet below ground surface (bgs) during this investigation and was, therefore, not sampled.

The geophysical survey identified one anomaly within the former automobile repair building. It was inconclusive whether this anomaly contained metal due to rebar reinforced concrete in the vicinity. There were no USTs, piping, metallic features and/or backfilled areas identified during the geophysical survey. The soil samples did not contain detectable concentrations of TPH-cc, including total petroleum hydrocarbons as gasoline (TPH-g), total petroleum hydrocarbons as diesel (TPH-d) and total petroleum hydrocarbons as motor oil (TPH-o) above the laboratory Practical Quantitation Limits (PQLs). None of the analyzed soil samples contained detectable concentrations of VOCs above the laboratory PQLs. Therefore, a release of hazardous materials was not identified during the investigation. Partner recommends no further investigation with respect to the former gasoline service station and former automotive repair businesses at this time.

The Phase I had four recommendations. Recommendation 1 was satisfied with the Subsurface Investigation. Recommendations 2, 3, and 4 are no longer applicable because the buildings on the western portion of the Project Site at the time of the assessment were demolished and excavated to a depth of approximately 33 feet. A new building was constructed in 2016-2017 on the eastern portion of the Project Site, which will remain. Thus, an O&M Program, an ACM survey, or repairing water damaged building materials would not be appropriate. Per Phase II, none of the analyzed soil samples contained detectable concentrations of TPH-cc or VOCs above the laboratory PQLs.

Original Baseline

Under the Original Baseline, the Project would not 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, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not 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, and the impacts will be less than significant.

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 not within a 500-foot school zone as listed by the Los Angeles Unified School District (LAUSD).[89] The nearest is Selma Elementary School, approximately 700 feet to the west. This school would be generally shielded from the Project Site by intervening residential and commercial buildings on Selma Avenue. These intervening structures and 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. In addition, the Project will have no impact during construction and will not emit any hazardous substances during operations.

Original Baseline

Under the Original Baseline, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school, and the impacts of hazardous materials within one-quarter mile of a school will be less than significant.

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

Current Baseline

Under the Current Baseline, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school, and the impacts of hazardous materials within one-quarter mile of a school will be less than significant.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from USTs, 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 as noted below:

According to EnviroStor, there are no cleanup sites, permitted sites, Leaking Underground Fuel Tanks (LUFTs), or Spills, Leaks, Investigation, and Cleanup (SLICs) on, in or under the Project Site.[90]

According to GeoTracker, there are no other cleanup sites, land disposal 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.[91]

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.[92] 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.[93] The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not

[90] *California Department of Toxic Substances Control: http://www.envirostor.dtsc.ca.gov/public/.*

[91] *California State Water Resources Control Board: http://geotracker.waterboards.ca.gov/map.*

[92] *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.*

[93] *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/, February 6, 2017.*

been identified as a hazardous waste facility.[94] The Project Site is identified as a HazNet, EDR US Historic Auto Station and an Emissions Inventory Data (EMI) site in the regulatory database report. According to records reviewed, the subject property identified as Hollywood Auto Body Center at 6421 Selma Avenue is listed in the HWTS under EPA ID No. CAL000049169. This facility generated 1.43 tons of unspecified solvent mixture in 2005. This facility was listed inactive on June 30, 2006. Additionally, the subject property identified as Network Auto Body Inc. at 6421 Selma Avenue is listed under EPA ID No. CAL000307733. This facility generated 2.08 tons of aqueous solution with organic residues less than 10% between the years 2008 and 2013. The use at 6421 Selma Avenue was removed and a new building has been constructed. Per the Subsurface Investigation, none of the analyzed soil samples contained detectable concentrations of TPH-cc or VOCs above the laboratory PQLs.

Original Baseline

Under the Original Baseline, the Project will not be located on a site which is included on a list of hazardous materials sites that would in a significant hazard to the public or the environment, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project will not be located on a site which is included on a list of hazardous materials sites that would in a significant hazard to the public or the environment, and the impacts will be less than significant.

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.[95] The Project Site is not located within two miles of a public airport. The nearest airports are Los Angeles International Airport (LAX) located 11.5 miles southwest, Santa Monica Airport located 8.5 miles southwest, Bob Hope-Burbank Airport located 6.5 miles north.

Original Baseline

Under the Original Baseline, no impacts related to safety hazards in an airport land use plan or within two miles of a public airport will occur.

Current Baseline

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[94] *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, 2015.*

[95] *City of Los Angeles, ZIMAS parcel search: http://zimas.lacity.org/.*

Under the Current Baseline, no impacts related to safety hazards in an airport land use plan or within two miles of a public airport will occur.

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

No Impact. There are no nearby private airstrips.

Original Baseline

Under the Original Baseline, no impacts related to safety hazards within the vicinity of a private airport will occur.

Current Baseline

Under the Current Baseline, no impacts related to safety hazards within the vicinity of a private airport 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 Impact. 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. As part of the building permit, the Project would be cleared with Hydrant and Access approval and Fire Marshall Fire Life Safety. The Project will not impede public access or travel on public rights-of-way such as Selma Avenue or Wilcox Avenue, and would not interfere with any adopted emergency response plan or emergency evacuation plan. The City's Critical Facilities and Lifeline Systems show selected disaster routes, emergency facilities, dependent care facilities and other important infrastructure.[96] No facilities are located nearby the Project Site. Therefore, impacts would be less-than-significant.

Original Baseline

Under the Original Baseline, the Project's impacts related to impairment of or physical interference with adopted emergency response plan or emergency evacuation plans will be less than significant.

Current Baseline

Under the Current Baseline, the Project's impacts related to impairment of or physical interference with adopted emergency response plan or emergency evacuation plans will be less than significant.

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

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,[97] nor does the Project Site contain any wildlands fire hazard terrain.[98]

Original Baseline

Under the Original Baseline, no impacts related to exposure of people or structures to significant risk of loss, injury or death involving wildland fires will occur.

Current Baseline

Under the Current Baseline, no impacts related to exposure of people or structures to significant risk of loss, injury or death involving wildland fires will occur.

[97] *City of Los Angeles, ZIMAS parcel search: http://zimas.lacity.org/.*

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

9. HYDROLOGY AND WATER QUALITY

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

Less Than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City 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.[99] 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 Section 64.70 (the City's stormwater code) and expanding on the City's existing 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 BMPs (determined on a case by case basis by the Department of Public Works), and if that is not feasible only then do SUSMP BMPs apply.

Construction

Construction activities associated with the Project are subject to City inspection and implementation of stormwater BMPs. Since the construction of the Project will not disturb greater than one acre of land (the total site area is 0.496 acres)[100], the Project applicant will not be required to obtain coverage under the

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[99] *Project applicants are required to prepare and implement a SUSMP 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/.*

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

General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).[101] Construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LID requirements.

Original Baseline

Under the Original Baseline, the Project includes the demolition of three existing buildings and excavation. The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality. Moreover, the Project shall comply with the regulatory measures. Therefore, the Project would not violate any water quality standards or waste discharge requirements, and the construction- related impacts to water quality will be less than significant.

Current Baseline

Under the Current Baseline, a portion of the Project would be constructed over the 20,624 square-foot existing building and a partial three level subterranean structure, which will remain on the site. The remaining portion of the Project would be constructed over the western portion of the Project Site, which is currently an excavated area. The excavation was completed with the issuance of a permit and no additional excavation, grading, or demolition is required. The Adopted MND analyzed the excavation of the area and found that impacts would be less than significant with the implementation of the regulatory compliance standards.

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

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

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[101] *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.*

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

While the Project has been revised, the lot area of the Project Site, proposed building footprint, and area of excavation remains the same as the Approved Project, which was analyzed as part of the Adopted MND. Therefore, the Project would not violate any water quality standards or waste discharge requirements, and the construction-related impacts to water quality will be less than significant.

Operation

The Project would not include industrial discharge to any public water system. Under existing conditions, runoff at the Project Site may contain typical urban pollutants such as automotive fluids (including oil and grease), commercial cleaning and landscaping pollutants discharged into the storm drainage system. Because there would be no substantial increase in runoff as a result of the Project (which would continue to have automobiles, and typical cleaning elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type than that which currently exists. The Project would be required to submit site drainage plans to the City Engineer and other responsible agencies demonstrating compliance with water quality standards and wastewater discharge BMPs set forth by the City and the 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.

Original Baseline

Under the Original Baseline, the Project would not violate any water quality standards or waste discharge requirements, and the operation-related impacts to water quality will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not violate any water quality standards or waste discharge requirements, and the operation-related impacts related to water quality will be less than significant.

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

No Impact. A significant impact may occur if a project includes 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 1.25 miles north of the Project Site. No settling ponds,

lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site or nearby. A public water system operated by the LADWP serves the Project Site. The sources of public water for the City are surface water from California Water Project and Colorado River purchased through the Metropolitan Water District (MWD) and groundwater.[102] The Project Site is located in an urbanized area of the City.

Original Baseline

Under the Original Baseline, demolition will occur in conjunction with the construction of new buildings. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge. The Project will not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table. Therefore, no impact will occur.

Current Baseline

Under the Current Baseline, the Project is to be built on top of an existing building. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge. The Project will not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table. Therefore, no impact will occur.

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

Less Than Significant Impact. 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. The Project Site is also not near, nor would it be altering, a stream or river. Project construction would temporarily expose on-site soils to surface water runoff. However, compliance with construction-related BMPs and/or Storm Water Pollution Prevention Plan (SWPPP) would control and minimize erosion and siltation. During project operation, storm water or any runoff irrigation waters would be directed into existing storm drains that are currently receiving surface water runoff under existing conditions.

Original Baseline

Under the Original Baseline, demolition would occur on the western side of the Project Site for the construction of the Project. The eastern portion of the site was previously excavated. Thus, the Project would not be altering the amount of impervious surface that affects drainage. Since the Project Site is almost entirely impervious, impermeable surfaces resulting from the development of the Project would

[102] *LADWP, Water, Sources of Water: https://www.ladwp.com/.*

not substantially alter the existing drainage pattern of the Project Site, 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. Therefore, impacts would be less than significant.

Current Baseline

Under the Current Baseline, a portion of the Project would be constructed over the 20,624 square-foot existing building and a partial three level subterranean structure, which would remain on the site. The remaining portion of the Project would be constructed over the western portion of the Project Site, which is currently an excavated area. The proposed building footprint as it relates to the Project Site was previously analyzed as part of the Adopted MND (ENV-2015-2672-MND). The MND found that since development of the proposed 20,624 square-foot restaurant and 6,000 square feet of retail would not be altering the amount of impervious surfaces, it would not substantially alter the existing drainage pattern of the Project Site, 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. The Project proposes to construct additional stories over the ground floor, but does not propose a change to the building footprint, which was previously analyzed and determined to have less than significant impacts. Therefore, impacts would be less than significant.

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

Original Baseline

Under the Original Baseline, demolition will occur in conjunction with the construction of new buildings. Thus, the Project would not be altering the amount of impervious surface that affects runoff. Part of the Site was excavated for the subterranean parking and incorporated construction-related BMPs and/or Storm Water Pollution Prevention Plan (SWPPP) would control and minimize erosion and siltation. Impermeable surfaces resulting from the development of the Project would not 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. . Therefore, no impact will occur.

Current Baseline

Under the Current Baseline, the Project is to be built on top of an existing building. Thus, the Project would not be altering the amount of impervious surface that affects runoff and development of the Project would not 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. Therefore, no impact will occur.

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

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving a Project Site. A project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. No natural watercourses exist on or in the vicinity of the Project Site. 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 (under the Original Baseline and Current Baseline) is required to comply with the NPDES program, LID BMPs, as well as the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants.

Construction

Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. The SWPPP shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. When properly designed and implemented, these "good-housekeeping" practices would reduce short-term construction-related impacts to a less than significant level by controlling dust and erosion that may occur onsite and leaks from any construction equipment. The Project is required to comply with the City's LID BMPs, which are determined on a case by case basis by the Department of Public Works. Approval for the Project and building/grading permits will not be granted or issued until appropriate and applicable stormwater BMPs are incorporate into the Project design plans.

Operation

The 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.

Original Baseline

Under the Original Baseline, the Project would not 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, and the construction and operation related impacts to water quality will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not 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, and the construction and operation related impacts to water quality will be less than significant.

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.

Original Baseline

Under the Original Baseline, the Project would not otherwise substantially degrade water quality, and the impacts to water quality will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not otherwise substantially degrade water quality, and the

impacts to water quality will be less than significant.

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

No Impact. This question would apply to the Project only if it were placing housing in a 100-year flood zone. The Project does not include residential dwelling units; and, it would not be located in a 100-year flood hazard area according to the Los Angeles Safety Element map.[103] 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.[104] A 0.2 percent annual chance is equivalent to a 500-year flood (the general range is 10 years to 500 years).

Original Baseline

Under the Original Baseline, the Project will not place housing within a 100-year flood hazard area and no impact related to this issue will occur.

Current Baseline

Under the Current Baseline, the Project will not place housing within a 100-year flood hazard area and no impact related to this issue will 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 500-year floodplain.[105]

Original Baseline

Under the Original Baseline, the Project will not be at risk of flooding, nor would place structures in a 100-year flood plain, which would impede or redirect flood flows. No impacts to flood flows will occur.

Current Baseline

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

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

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

Under the Current Baseline, the Project will not be at risk of flooding, nor would place structures in a 100-year flood plain, which would impede or redirect flood flows. No impacts to flood flows will occur.

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

Less Than Significant Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. The nearest surface water in the vicinity is the Hollywood Reservoir created by the Mulholland Dam, approximately 1.25 north of the Project Site. The Project Site, and much of the HCP area, is located within a potential inundation area.[106] 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 Los Angeles 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. [107]

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).[108] 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, DSOD inspectors accompany LADWP Reservoir Surveillance personnel into the field to inspect each dam and reservoir. The Water System's Geotechnical Engineering Group maintains a program for periodically analyzing its dams and reservoirs for earthquake safety.[109]

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

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

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

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

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 Project 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.

Original Baseline

Under the Original Baseline, the Project would not 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, and the impacts related to flooding will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not 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, and the impacts related to flooding will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a Project Site is sufficiently close to the ocean or other water body to be potentially at risk for the effects of seismically-induced tidal phenomena (seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. The nearest surface water in the vicinity is the Hollywood Reservoir created by the Mulholland Dam, approximately 1.25 miles north 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.[110]

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.[111] The Project Site is not within a Hillside Area.[112] In addition, the

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

[111] *Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, February 6, 2017.*

[112] *City of Los Angeles, ZIMAS parcel search: http://zimas.lacity.org/.*

City of Los Angeles ZIMAS mapping system [113] and the Safety Element of the City of Los Angeles [114] do not classify the Project Site as within a landslide area, or identified as a bedrock or probably bedrock landslide site. The hillside area generally includes the Hollywood Hills, north of Franklin Avenue. Small areas (5-100 acres) of bedrock landslide sites are located in central Griffith Park. Further, according to the State of California Seismic Hazards Map[115], the Project Site is not at risk for landslides.[116] Thus, there is no potential for mudflow. Therefore, the Project will not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

Original Baseline

Under the Original Baseline, the Project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow, and the impacts related to tsunamis, seiches, and mudflow will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow, and the impacts related to tsunamis, seiches, and mudflow will be less than significant.

[113] *City of Los Angeles, ZIMAS parcel search: http://zimas.lacity.org/.*

[114] *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 February 6, 2017.*

[115] *California, Department of Conservation, Landslide Maps: http://www.quake.ca.gov/gmaps/WH/landslidemaps.htm, accessed February 6, 2017.*

[116] *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 February 6, 2017.*

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

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of a project.

A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community.

The Project Site is surrounded by existing urban uses within a high-density area of Hollywood, including a mix of residential, commercial, entertainment, and public facility land uses. The land uses immediately adjacent the Project Site include a surface parking lot and three-story multi-family apartment building to the north of the site, a U.S. Post Office station to the west across Wilcox Avenue, a mix of single-story commercial buildings and surface parking lots to the south across Selma Avenue, and a 10-story 179 guest room hotel to the east.

The Project would construct a 114 guest room hotel and approximately 1,939 square foot ground floor restaurant on a lot with an existing single-story restaurant structure. The Project Site is not of a scale or nature that could physically divide an established community. The Project would not cause any permanent street closures, block access to any surrounding land uses, or cause any change in the existing street grid system. The Project would not create a conflict of scale, intensity, or use that would serve as a physical division. The Project would be complementary to the existing urban land uses in the area

Original Baseline

Under the Original Baseline, the Project would not physically divide an established community and no impacts will occur.

Current Baseline

Under the Current Baseline, the Project would not physically divide an established community and no impacts will occur.

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

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate. The legal standard that governs consistency determinations is that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan. [117] Further, pursuant to the *L.A. CEQA Thresholds Guide*, determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether the proposal is consistent with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

The Project Site is located in the Hollywood neighborhood of the City. Thus, the Project is subject to the following list of applicable plans:

Regional Level

SCAG Regional Comprehensive Plan Guide (RCPG)

SCAG Regional Comprehensive Plan (RCP)

SCAG Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)

SCAQMD's 2016 Air Quality Management Plan (AQMP)

Los Angeles Metro's Congestion Management Plan (CMP) for Los Angeles County

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[117] *See Sequoyah Hills Homeowners Assn. v. City of Oakland (1993) 23 Cal.App.4th 704, 717-18 [upholding a city's determination that a subdivision project was consistent with the applicable general plan]). As the Court explained in Sequoyah, "state law does not require an exact match between a proposed subdivision and the applicable general plan." To be "consistent" with the general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning, the project must be "in agreement or harmony with the applicable plan." (See also Greenebaum v. City of Los Angeles (1984) 153 Cal.App.3d 391, 406; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002)102 Cal.App.4th 656, 678.) Further, "[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (Friends of Lagoon Valley v. City of Vacaville (2007) 154 Cal.App.4th 807, 817.) Courts also recognize that general plans "ordinarily do not state specific mandates or prohibitions," but instead provide "policies and set forth goals." (Id.)*

Local (City of Los Angeles)

- *Los Angeles City General Plan*
- *Hollywood Community Plan (HCP)*[118][119]
- *Hollywood Redevelopment Plan*
- *City of Los Angeles Municipal Code (LAMC)*
- *Los Angeles Green Building Code*

Consistency with Regional Plans

SCAG RCPG

The Project would be consistent, or not interfere, with the implementation of the goals in the RCPG. The RCPG was adopted in 1996 by the member agencies of SCAG to set broad goals for the Southern California region, with the exception of the County of San Diego, and to identify strategies for agencies at all levels of government to use in guiding their decision-making. The RCPG identifies significant issues and changes that can be anticipated by the year 2015 and beyond. Adopted policies related to land use are contained primarily in the Growth Management chapter of the RCPG. The primary goal of the Growth Management chapter is to address issues related to growth and land use by encouraging local land use actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources, and enhance the quality of life in the region. SCAG uses the criteria in CEQA Guidelines Section 15206 to define what a regionally significant project is:

1. A proposed local general plan, element, or amendment thereof for which an EIR was prepared.

2. A proposed residential development of more than 500 dwelling units.

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[118] *Until recently, the Project Site was subject to the HCP Update, which was adopted by City Council on June 19, 2012. 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. 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 HCP, in conjunction with the applicable provisions of the LAMC guide the land use and zoning on the Project Site, respectively.*

[119] *ZI-2433 became effective on February 18, 2014 in response to the Los Angeles 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.*

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 area wide 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:[120]

- Re-invigorate the region's economy,
- Avoid social and economic inequities and the geographical dislocation of communities, and
- Maintain the region's quality of life.

While the Project is not of the scale to be considered regionally significant based on the criteria above, the Project will nevertheless be consistent with, or not interfere with implementation of, the goals of the Growth Management Chapter of the RCPG. The Project would include a hotel and restaurant uses to provide additional jobs, revenue, and economic activity in the area. The Project would not dislocate a

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

community or increase social or economic inequalities. The Project would include a hotel use near similar compatible uses, such as offices and entertainment options in the HCP area.

SCAG 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 comprehensive responses to growth and infrastructure challenges and recommends an Action Plan targeted for the year 2035. The RCP does not mandate integrated resources planning; however, SCAG does request that local governments consider the recommendations set forth on the RCP in their General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions. The RCP is an advisory document that contains policies that apply to public and/or private sectors. Public sector includes SCAG, local and state governments, transportation commissions, and resource agencies and conservation groups. Many of the policies apply to SCAG and the public sector, and are intended to inform how SCAG and governments should work to integrate growth and land use planning. The RCP policies are organized in the following categories: Land Use and Housing, Open Space and Habitats, Water, Energy, Air Quality, Solid Waste, Transportation, Security and Emergency Preparedness, and Economy. *Table 3.10-1 – SCAG Regional Comprehensive Pl*an 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 RCP.

RTP/SCS

On April 7, 2016, SCAG adopted the 2016-2040 RTP. The SCS is a required element of the RTP/SCS. The RTP/SCS is a blueprint for policies related to transportation and land use projects that improve overall mobility, reduce GHGs, and enhance the overall quality of life for the regions 22 million residents by 2040. The RTP/SCS is intended to facilitate a greater diversity of 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/SCS is intended to promote the creation jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes. The consistency of the Project with the RTP/SCS is address in *Table 3.10-2.* As shown, the Project would be consistent with the applicable goals in the RTP/SCS.

Applicability of SCAG Plans

The goals and policies of the RCPG, Sustainability Program, RCP, and RTP address projects considered to be regionally significant. To monitor regional development, CEQA requires regional agencies, such as SCAG, to review projects and plans throughout its jurisdiction. In the Southern California region, with

exception of the County of San Diego, SCAG acts as the region's "Clearinghouse," and collects information on projects of varying size and scope to provide a central point to monitor regional activity.

The Project is not considered to be a regionally significant project pursuant to CEQA Guidelines section 15206.[121] The consideration for a commercial development is employing more than 1,000 persons or more than 250,000 square feet. The Project would maintain an existing 20,624 square-foot restaurant and proposes a 1,939 square-foot restaurant and a 114 guestroom hotel. As such, the Project will not be required to demonstrate consistency with SCAG policies contained in the RCPG, RCP, or RTP.

SCAQMD's 2016 AQMP

The 2016 AQMP was prepared to accommodate growth, to reduce high levels of pollutants within the areas under the jurisdiction of the SCAQMD, to return clean air to the region, and to minimize the impact of pollution control on the economy. In the Basin, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2016 AQMP.[122] The AQMP works with the 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.

The Project would comply with the SCAQMD rules and regulations that are in effect at the time of the development. The Project will not directly increase population because the Project will not introduce permanent housing (the Project is a hotel and commercial development). Thus, its impact on regional air quality is accommodated by the overall growth assumptions in the 2016 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. Operation of the Project would generate a net increase of approximately 94 employees (see Table 3.13-2 of this MND). It is anticipated that most of the expected employees would be drawn from the existing labor force in the region and would not require the need to relocate or place a demand for housing in the area. There is a possibility that some of the future employees would be permanent residents to the area; however it is unlikely that this growth would be substantial in the context of the already-forecasted growth for the Hollywood community studied under the Hollywood Community Plan.

Therefore, the Project is consistent with the SCAQMD's 2016 AQMP and is considered to have a less-than-significant cumulative effect on regional air pollution. The SCAG 2016 RTP/SCS include

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

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

transportation programs, measures, and strategies generally designed to reduce VMT, which are contained within baseline emissions inventory in the 2012 AQMP (previous AQMP).

LA Metro CMP for Los Angeles County.

The Los Angeles Metropolitan Transportation Authority (Metro) is designated as the congestion management agency responsible for coordinating regional transportation policies. The CMP for Los Angeles County was developed pursuant to Section 65089 of the California Government Code and 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. The Project's traffic analysis, which is discussed in greater detail under Question 16(b), *ante*, in this IS/MND. The traffic study provided the following conclusion: No CMP intersection (Santa Monica and Highland Avenue) or freeway (Hollywood Freeway) impacts are anticipated.[123]

Consistency with Local Plans

City General Plan

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

General Plan Framework Element

The Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the community plans and citywide elements. The Land Use Chapter of the Framework Element discusses goals, objectives, and polices as it relates to the distribution of land uses. Additionally, it identifies key areas where certain land uses should be located, as well as identifying the objectives and characteristics of the land uses. The areas identified by the Framework Element are intended to guide the Community Plan in further defining the boundaries, land use categories, intensities, and heights for each

[123] *Traffic Impact Analysis, Overland Traffic Consultants, Inc., May 2017.*

[124] *California Government Code Section 65300.*

of the land uses. The Framework Element identifies segments of Hollywood and Sunset Boulevard, including the Project Site, as a Regional Center.[125]

Regional centers are intended to serve as the focal points of regional commerce, identity, and activity. They cater to many neighborhoods and communities and serve a population of 250,000 to 500,000 residents. They contain a diversity of uses such as corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Region-serving retail commercial malls and retail services should be integrated where they complement and support the other uses in the regional center. The development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities. Regional centers, typically, provide a significant number of jobs and many non-work destinations that generate and attract a high number of vehicular trips. Consequently, each center shall function as a hub of regional bus or rail transit both day and night. Good quality street, area, and pedestrian lighting is essential to generating feelings of safety, comfort, and wellbeing necessary for ensuring public nighttime use of transit facilities. They are typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Generally, regional centers will range from a floor area ratio (FAR) of 1.5:1 to 6:1 and are characterized by six- to twenty-story (or higher) buildings as determined in the community plan. Their densities and functions support the development of a comprehensive and inter-connected network of public transit and services. Physically, the regional centers are generally characterized by three forms of development:

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

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

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

Table 3.10-3 – General Plan Land Use lists the goals, objectives, and policies of the Framework Element 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 regional center commercial. Therefore, no significant impacts due to consistency with land use designations in the General Plan Framework are anticipated.

[125] https://planning.lacity.org/cwd/framwk/chapters/03/F31MtoMp.pdf

Plan inconsistencies in and of themselves are not a significant impact on the environment cognizable under CEQA, which recognizes only direct physical changes in the environment or reasonably foreseeable indirect physical changes in the environment.[126] Moreover, the City's threshold of significance considers only inconsistencies with policies "adopted for the purpose of avoiding or mitigating an environmental effect." To the extent the Framework's provisions arguably reflect environmental considerations, they address whether industrial uses would affect nearby land uses. The Project does not affect these policies because CEQA considers only the Project's impacts on its environment, not the environment's impacts on the Project.

Hollywood Community Plan

The Project Site is located within the HCP, which was adopted in December 1988.[127] Until recently, the Project Site was subject to the 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.[128] 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 a resolution to rescind the HCP Update and adopted Ordinance No. 182,960 to repeal the associated zoning ordinance all to comply with the court's order. Therefore, the HCP Update and the associated zoning ordinance have been repealed, rescinded and invalidated. By operation of law, the 1988 HCP (See City Council action CF 12-0303 S4), in conjunction with the applicable provisions of the LAMC guide the land use and zoning on the Project Site, respectively.

The HCP contains 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 HCP is 26-years-old and provided projections through the year 2010. As such, objectives do not reflect recent developments in the area, including the addition of the Metro Red Line subway and Metro Rapid bus routes. The 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.

The Project Site is designated by the HCP with the Regional Center Commercial land use designation. The Project Site is zoned C4-2D, which allows for a variety of commercial uses, including hotel and

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

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

[128] *Superior Court Judge Allan J. Goodman, December 10, 2013. Case Nos. BS138580, BS138169, and BS138370.*

retail. The Project Site is subject to a Development "D" Limitation, which limits the maximum permitted FAR in Height District 2 to 2:1, unless additional FAR is approved by the City Planning Commission, subject to an agreement with the Community Redevelopment Agency (CRA). A Vesting Zone and Height District change from C4-2D to [Q]C2-2D has been requested to permit a maximum FAR of 3.7:1 in lieu of the permitted 2:1 FAR. Based on the Project Site's lot area of 21,610.7 square feet, the maximum allowable building area for a 3.7:1 FAR would be 79,957 square feet, which is consistent with the Project design.

The HCP includes seven objectives that are directed to the City 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. 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, Los Angeles Police Department [LAPD], Los Angeles Department of Recreation and Parks [LADRP], and Los Angeles Public Library [LAPL]). The Project would not conflict with any of the objectives. The HCP also contains policies and standards for circulation (directed to Los Angeles Department of Transportation [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.

Table 3.10-4 – Hollywood Community Plan sets forth the HCP's seven objectives discusses the Project's consistency and applicability with each of them. As shown, the Project would be consistent with the applicable objectives and policies of the Hollywood Community Plan.

Additionally, development of the Project would require the following discretionary actions:

1) A **Vesting Tentative Tract Map** pursuant to LAMC Section 17.15, to permit the airspace subdivision of the property into four lots containing one master lot and three (3) airspace lots containing 114 hotel guest rooms, parking, storage, and commercial/restaurant uses.

2) Pursuant to LAMC Section 12.32 F, a Vesting Zone Change and Height District Change from C4-2D to (T)(Q) C2-2D to permit an FAR of up to 3.7:1;

3) A **Conditional Use Permit,** pursuant to LAMC Section 12.24 W.1, for the on-site sale and dispensing of alcoholic beverages incidental to a proposed 114-guestroom hotel and restaurant with 100 seats (60 indoor seats and 40 outdoor seats).

4) A **Site Plan Review**, pursuant to LAMC Section 16.05 to permit the construction, use, and maintenance of a hotel with greater than 50 guest rooms.

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

With approval of the discretionary actions from the City, the Project would be consistent with applicable land use classifications at the time of project buildout.

Transit Priority Area in the City of Los Angeles (ZI-2452)

On September 2013, Governor Jerry Brown signed into law SB 743, which instituted changes to the CEQA when evaluating environmental impacts to projects located in areas served by transit. While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and

2. The project is located on an infill site within a transit priority area.[129]

The Project contains multiple uses, include hotel and commercial uses. A hotel is classified as a residential building designed or used for or containing six or more guest rooms or suites of rooms, which may also contain no more than one dwelling unit, but not including any institution in which human beings are housed or detained under legal restraint.[130] The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been previously developed.[131] The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit stop.[132] The Project Site is within one-half mile of two Metro Red Line subway stations nearby (approximately 1,500 feet southwest of Metro's Hollywood/Vine Station and approximately 2,700 feet southeast of Metro's Hollywood/Highland Station). The Project is also proximately located by numerous local and rapid bus services, include Metro lines 212/312, 217, 222 and DASH Hollywood at the intersection of Cahuenga and Hollywood, approximately 650 feet north of the Project Site.

Los Angeles State Enterprise Zone (ZI-2374)

The Project Site is within the Los Angeles State Enterprise Zone.[133] The federal, state, and local 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.

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[129] *http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf.*

[130] *LAMC Section 12.03.*

[131] *California Public Resources Code Section 21099(a)(4).*

[132] *California Public Resources Code Section 21099(a)(7).*

[133] *ZIMAS search: http://zimas.lacity.org/.*

> Parking Standards - Section 12.21-A,4(x)(3):
>
> Except for the Downtown Business District parking area described in Section 12.21-A,4(i), projects within EZs may utilize a lower parking ratio for commercial office, business, retail, restaurant, bar and related uses, trade schools, or research and development buildings thus increasing the buildable area of the parcel which is critical in older areas of the City where parcels are small.
>
> Height - Section 12.21.4:
>
> Special height districts "EZ1", "EZ1-L", "EZ1-VL", "EZ1-XL", "EZ2", "EZ3" and "EZ4 were established for Enterprise Zones. Height district "EZ1" increases the total floor area contained in all the buildings on a lot to three times the buildable area. Note that the "EZ..." height district suffix must be accomplished by a Zone Change.[134]

The Project proposes to provide the minimum LAMC requirement for parking, including a bike parking reduction. The maximum height would be 84' 4" and the Project Site is in Height District 2, which is not one of the listed height districts as part of the EZ.

Hollywood Redevelopment Project Area

The Project Site is located within the Hollywood Redevelopment Project Area.[135] Development within the Regional Center Commercial designation is restricted to an average FAR of 4.5:1. The intent for development within the Regional Center Commercial designation is to provide for economic development and guidance of high quality commercial, recreational, and residential urban environment with an emphasis on entertainment-oriented uses. To exceed an FAR of 4.5:1, the Hollywood Redevelopment Plan requires the CRA/LA, a Designated Local Authority (successor agency to the former CRA of Los Angeles) to make certain findings and enter into an agreement with applicant to ensure that the proposed project will conform to the Redevelopment Plan.

All applications within the Hollywood Redevelopment Project Area requesting a permit for construction, remodeling, improvements, alterations including seismic compliance, demolition and/or signs must be referred to the CRA for both CEQA clearance and permit approval.[136]

On December 29, 2011, the California Supreme Court issued its decision in *California Redevelopment Association v. Matosantos* (2013) 212 Cal.4th 1457. The decision upheld recently enacted state law dissolving all California redevelopment agencies including the Community Redevelopment Agency of Los Angeles (CRA/LA) and made the dissolution of the agencies effective February 1, 2012. For

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

[135] *ZIMAS search: http://zimas.lacity.org/.*

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

purposes of this analysis, any references to the former CRA/LA are intended to mean the Designated Local Authority pursuant to changes in state law as discussed above. CRA is statutorily prohibited from entering any new agreements and is currently only allowed to wind down CRA affairs, including honoring existing obligations and addressing land use issues consistent with CRA's land use powers under the Redevelopment Plan. To date, the CRA has not transferred its land use powers to the City's Department of City Planning.

The proposed FAR is 3.7:1 and thus does not trigger the CRA/LA findings and agreement requirements as the Project does not exceed the 4.5:1 threshold.

The Project is undergoing the CEQA process, which provides public review and input on the analysis of the Project. The Project provides a net increase in employment opportunities on-site. The Project is a development of a proposed restaurant and hotel, as well as the continued use of an existing restaurant, to serve the diverse needs in the Hollywood Redevelopment Plan area. The consistency of the Project with the applicable goals of the Hollywood Redevelopment Project is presented in *Table 3.10-5*. As shown, the Project would be consistent with the applicable goals in the Hollywood Redevelopment Project.

Los Angeles Municipal Code

All development activity is subject to Article 2 of the LAMC, otherwise known as the Planning and Zoning Code. The Planning and Zoning Code includes development standards for property and zoning districts in the City. The Project Site's Regional Center Commercial land use designation lists the following corresponding zones: C4, C2, P, PB, RAS3, and RAS4 zones. The Project Site has zoning designation of C4-2D (Commercial Zone – Height District 2 with a "D" Development Limitation). The Project is requesting a zone change from C4-2D to [Q]C2-2D. The C commercial zone permits a variety of commercial uses including, but not necessarily limited to:

- Offices
- Hotels
- Hospitals
- Churches
- General Retail
- Theaters
- Multi-family residential

The Project will maintain the existing 20,624 square-foot restaurant and proposes a 1,939 square-foot ground floor restaurant, a 114 guest room hotel with rooftop amenity deck with pool, lounge, and bar area. The existing and proposed uses are permitted uses within the requested C2 Zone.

Height District 2 permits a FAR of up to 6:1. The D development limitation in Ordinance 165,660, however, restricts the Project Site's FAR to 2:1. The 2:1 FAR may be exceeded subject to City Planning Commission approval and an agreement with the CRA.

The proposed FAR for the Project Site is 3.7:1, inclusive of the existing ground floor commercial/restaurant building. In order to construct the Project, the Project is requesting a Height District Change to maintain the existing Height District 2 designation and to amend the D Limitation to permit an FAR of 3.7:1.

The allowable height of structures in the C2 zone in Height District 2 is unlimited with no story limit. The proposed height is 84'4" and eight stories.

The allowable density for development in the existing C4 and requested C2 zone is the same as those in the R4 Zone, which permits a guest room density of 1 guest room per 200 square feet of lot area. Pursuant to LAMC Section 12.22-A,(18)(a), R5 uses may be permitted in specified commercial zones, including the existing C4 and requested C2 Zones, for mixed-use projects which are located on project sites located within a designated "Regional Center" or "Regional Commercial" area, as adopted by the Community Plan. The R5 Zone, pursuant to LAMC Section 12.12-C,4, permits one dwelling unit per 200 square feet of lot area and does not have a limitation on the minimum lot area per guest room. The Project proposes a mixed-use building which would maintain the existing restaurant, and to construct a second restaurant and a 114 guestroom hotel.

Table 2-2 (in Section 2 of this MND) provides a summary of the LAMC-required parking for the Project. Valet services will be provided along the north side of Selma Avenue and east side of Wilcox Avenue along the Project frontages. The main drop-off vehicle valet service will be provided along Selma Avenue. Due to the shared usage of the valet service area on Selma Avenue between the existing restaurant and proposed hotel, some of the patrons will make use of or be direct to the valet service area on Wilcox Avenue. Vehicles that approach the site from the east will need to circulate along Hollywood Boulevard, Sunset Boulevard and Cahuenga Avenue to approach the Selma Avenue valet zone in the westbound direction. The parking structure is accessed from a driveway on Wilcox Avenue. There will be a minimum of 50 total underground on-site parking spaces to serve the Project and 36 off-site spaces. The remaining 36 spaces will be accommodated by parking structure as part of the permitted and under construction Thompson Hotel Project at 1541 Wilcox Avenue. There may be a possibility of expanding the number of parking spaces within the garage through a more efficient parking-attendant stacked-parking system. This greater efficiency will be studied once a parking operator is identified for the Project.

Additionally, the Project will provide 88 bicycle parking spaces in accordance with LAMC 12.21-A. It is not anticipated that hotel guests will arrive via bicycle. However, it is anticipated that employees of the hotel may arrive via bicycle, and the hotel will offer free bicycles to its guests to experience the Hollywood neighborhood.

Los Angeles Green Building Code

On December 13, 2013, the City approved Ordinance No. 182,849, as the most recent update to the Los Angeles Green Building Code ("LA Green Building Code"). The current 2014 LA Green Building Code is based on the 2013 California Green Building Standards Code (commonly known as CALGreen), which was developed and mandated by the State to attain consistency among the various jurisdictions within the State with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential);
- Every building alteration with a building permit valuation of $200,000 or more (residential and non-residential);
- Residential alterations that increase the building's conditioned volume; and
- Every building addition (residential and non-residential)

The Project would meet the requirements in the LA Green Building Code. The building would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star®-rated appliances, water saving/low-flow fixtures, non-volatile organic compound paints/adhesives, drought-tolerant planting, and high performance building envelopment. The proposed building would accommodate solar photovoltaic panels and on-site electric vehicle chargers.

Original Baseline

Under the Original Baseline, the Project would not conflict with applicable land use plans, policies, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not conflict with applicable land use plans, policies, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect, and the impacts will be less than significant

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

No Impact. A significant adverse effect could occur if a Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan. The Project Site is located in an urbanized and fully developed portion of the City. No such habitat conservation plan or community conservation plan exists which would govern any portion of the Project Site. Thus, the Project would not have the potential to cause adverse effect and there would be no impact.

Original Baseline

Under the Original Baseline, 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. Therefore, no impact will occur.

Current Baseline

Under the Current Baseline, 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. Therefore, no impact will occur.

Table 3.10-1

SCAG Regional Comprehensive Plan

Policies	Discussion
Land Use and Housing [1]	
LU-6.2 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Programs.	**Consistent.** The Project would comply with CALGreen requirements of the California Building Code and incorporates green and conservation features, through mitigation measures. The Project would also be consistent with the City Building Code, including the LAGBC for all new buildings (residential and non-residential). The LAGBC is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Open Space and Habitat [2]	
OSN-14 Developers and local governments should implement mitigation for open space impacts through the following activities: • Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space. • Individual projects should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA's Critter Crossings, and Ventura County Mitigation Guidelines. • Project level mitigation for RTP's significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements. • Project sponsors should fully mitigate direct and indirect impacts to open space	**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 the HCP surrounded by other urban uses. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Project Site. There are three magnolia trees located along Selma Avenue parkway whose trunk diameters range from three inches to five inches and therefore are not mature, significant trees. There is one *Washingtonia robusta* (Mexican fan palm) that has an 18-inch trunk diameter but it off the Project Site by several feet and will not be impacted by the Project. Therefore, the Project would not conflict with any local policy or ordinance protecting biological resources. If the Project were to impact these trees, the Project would comply with the City's regulations regarding tree removal and replacement.

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

Policies	Discussion
land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	water infrastructure can supply the domestic needs of the Project during the 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.
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.	**Not Applicable.** Upon completion, the Project will cover the entire Project Site. There is no open space for landscaping. The Project may include landscaping/vegetation on the roof.
WA-13 Developers and local governments should protect and preserve vital land resources—wetlands, groundwater recharge areas, woodlands, riparian corridors, and production lands. The federal government's 'no net loss' wetlands policy should be applied to all of these land resources.	**Not Applicable.** The Project would not impact wetlands.
WA-27 Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.	**Consistent.** The Project covers the entire site with a building. Though the building is an impervious surface covering the entire lot, the Project would comply with LID requirements and other regulations to ensure that water quality and stormwater flow are in compliance.
WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.	**Consistent.** The Project would comply with CALGreen requirements of the California Building Code, for water and energy conservation. The Project would also be consistent with the LAGBC for all new buildings (residential and non-residential). The LAGBC is designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Energy [4]	
EN-8 Developers should incorporate and local governments should include the following land use principles that use resources e□ciently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure. • Land use and planning strategies to increase biking and walking trips.	**Consistent.** The Project is in proximity to local transit lines, including Metro buses. The Project would encourage biking and walking trips due to bicycle parking and within a pedestrian-oriented area along Cahuenga Boulevard. The Project is also located to numerous local and rapid bus services, include Metro lines 212/312, 217, 222 and DASH Hollywood at the intersection of Cahuenga and Hollywood, approximately 650 feet north of the Site.
EN-10 Developers and local governments should integrate green building measures	**Consistent.** The Project would be in compliance with the City's Green Building

Policies	Discussion
into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include: • Using energy e□cient 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 e□cient commercial/residential space and water heaters: this could include the advertisement of existing and/or development of additional incentives for energy e□cient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits. • Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, which allow communities to generate their own electricity • Orienting streets and buildings for best solar access. • Encouraging buildings to obtain at least 20% of their electric load from renewable energy.	Ordinance, which contains energy efficient practices such as requirements for heating and cooling and reduced water usage (water conveyance uses energy).
EN-11 Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction should be completed according to the specifications of the energy provider.	**Consistent.** 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) 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.

Policies	Discussion
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.	**Not Applicable.** The Project may incorporate solar panels, although this is not a requirement.
EN-14 Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.	**Consistent.** The hotel uses would comply with the LAMC requirements for all mandatory (Code-required) transportation measures to reduce single-occupancy vehicle trips. The Project includes bicycle parking, ride share options, and proximity to transit.
Solid Waste [5]	
SW-14 Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include: • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.). • Reuse of existing building structure and shell in renovation projects. • Building lifetime waste reduction measures that should be explored for new and remodeled buildings include: • Development of indoor recycling program and space. • Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components.	**Consistent.** The Project would include an operational recycling program as required by LAMC and AB 341 (Mandatory Commercial Recycling). During operation, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.
SW-17 Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and	**Not Applicable.** The Project would not be a composting, or composting, recycling, or conversion technology facility.

Policies	Discussion
have minimum environmental and health impacts.	
SW-18 Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.	**Not Applicable.** The Project would not be a waste management facility.
SW-19 Developers and local governments should facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.	**Not Applicable.** The Project would not be an eco-industrial park.
SW-20 Developers and local governments should prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities near existing waste management or material recovery facilities.	**Not Applicable.** The Project would not be a solid waste management facility.

SCAG Regional Comprehensive Plan: http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf
[1] Page 21; [2] Pages 34 and 39; [3] Pages 59-61; [4] Pages 75-76; [5] Pages 105-106
Table: CAJA Environmental Services, March 2017.

Table 3.10-2

SCAG Regional Transportation Plan

Goals and Policies	Discussion
Goals	
Goal 1 Align the plan investments and policies with improving regional economic development and competitiveness.	**Consistent.** The Project is consistent because it would redevelop an underutilized infill parcel with services and jobs near public transit. The Project would be accessible for all people. The Project would not impede safe travel and use of a transportation system. The Project would be built to the latest energy efficiency requirements.
Goal 2 Maximize mobility and accessibility for all people and goods in the region.	
Goal 3 Ensure travel safety and reliability for all people and goods in the region.	
Goal 4 Preserve and ensure a sustainable regional transportation system.	
Goal 5 Maximize the productivity of our transportation system.	
Goal 6 Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	
Goal 7 Actively encourage and create incentives for energy efficiency, where possible.	
Goal 8 Encourage land use and growth patterns that facilitate transit and active transportation.	
Goal 9 Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies,	
Guiding Policies	
Policy 1. Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	**Not Applicable.** The Project is not a transportation project. The Project does not make policy decisions on transportation investments. However, the Project would address the spirit of this policy as it is near transit and would be pedestrian friendly.
Policy 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.	**Not Applicable.** The Project is not responsible for ensuring safety and maintenance of the transportation system. However, the Project would address the spirit of this policy as it is near transit and would be pedestrian friendly.
Policy 3. RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	**Consistent**. The Project is consistent because it would redevelop an underutilized infill parcel with services and jobs near public transit.
Policy 4. Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	**Not Applicable.** The Project does not make policy decisions. However, the Project would address the spirit of this policy as it is near transit and would be pedestrian friendly.
Policy 5. HOV gap closures that significantly increase transit and rideshare usage will	**Not Applicable.** The Project does not make policy decisions. However, the Project would

Goals and Policies	Discussion
be supported and encouraged, subject to Policy 1.	address the spirit of this policy as it is near transit and would be pedestrian friendly.
Policy 6. The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.	**Not Applicable.** The Project does not make policy decisions. However, the Project would address the spirit of this policy as it is near transit and would be pedestrian friendly.
Policy 7. The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.	**Not Applicable.** The Project does not make policy decisions. However, the Project would address the spirit of this policy as it is near transit and would be pedestrian friendly.
Policy 8. 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.	**Not Applicable.** The Project is not responsible for monitoring progress on the RTP. However, the Project would address the spirit of this policy as it is near transit and would be pedestrian friendly.
SCAG Regional Transportation Plan: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_04_CreatingAPlanForOurFuture.pdf *Table: CAJA Environmental Services, December 2017.*	

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

Goal, Objective, Policies	Discussion
Distribution of Land Use	
Objective 3.1 Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses and visitors.	**Consistent.** The Project is consistent with this Objective by providing hotel uses 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. The Project will provide upscale hotel accommodations that support Hollywood's status as an international entertainment destination through providing guest rooms for people in the entertainment industry and visitors. In addition to guest rooms, the hotel provides a view shed amenity with a roof deck area where patrons can enjoy the views of Hollywood and greater Los Angeles.
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.	**Not Applicable**. The Project is not seeking an amendment to any local community plans or General Plan.
Objective 3.2 Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.	**Consistent.** The Project Site is located approximately less than a mile away from the I-101 and within a mile of both the Hollywood/Vine and Hollywood/Highland Metro Rail Stations. The proximity of these transportation opportunities will provide convenient vehicular and transit access to and from the Project. Located within walking distance of cafes and restaurants, guests can easily and conveniently access nearby dining establishments without driving or hiring a car service. The Project includes bicycle parking and vehicle parking reductions due to bike parking replacement. The Site is in proximity to transit lines.
Policy 3.2.4 Provide for the siting and design of new development that maintains the	**Consistent.** The Project is consistent with the existing land use pattern along Selma

Goal, Objective, Policies	Discussion
prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	Avenue and of similar height and density. The blocks surrounding the Property have several buildings that are existing, under construction, approved, and proposed that exceed a 2:1 FAR. The Project is consistent with uses permitted in the Regional Center Commercial land use designation that are typically developed at a greater intensity. The Project furthers the goal of Hollywood as an international center for the entertainment business and continues the land use pattern of denser development.
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.	**Consistent.** The Project advances this Objective by accommodating new hotel use in a neighborhood that is already highly urbanized and proximate to the intersection of existing (Cahuenga Boulevard) transit corridors. With proximity to the Metro Red Line Hollywood/Vine Station, the Project offers connection for its guests to the rest of the City via alternative transportation. Additionally, the Project is located away from residential areas to preserve existing neighborhood and instead direct activity into the regional commercial district.
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).	**Consistent.** The Project is not located within a stable residential neighborhood or low-intensity commercial district. Rather, it is adjacent to a major corridor in rapid transition and characterized by new dense mixed-use residential, retail and office developments.
Policy 3.4.7 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use 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.	**Consistent.** The Project as proposed supports the objectives of the General Plan Framework Element's Land Use chapter to support the viability of the City's commercial districts. Specifically, the Project supports sustainable growth in a higher-intensity commercial and mixed-use Regional Center. The Framework Element generally recognizes Regional Centers as having FARs between 1.5:1 to 6.0:1 and characterized by six- to 20-story buildings. The Project proposes an FAR of 3.7:1 and eight floors which is within the Framework Element's characterization of Regional Centers. Additionally, the Project fulfills the goals of the General Plan by replacing an underutilized site with a more suitable use that is compatible with surrounding uses. The Project also supports the objectives of the HCP by "furthering the development of

Goal, Objective, Policies	Discussion
	Hollywood as a major center of employment."
Region Characteristics/Uses (Table 3-1 of Framework)	
• Corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities (libraries, museums, etc.), commercial overnight accommodations, and similar uses. • Mixed-use structures integrating housing with commercial uses • Multi-family housing (independent of commercial) • Major transit hub • Inclusion of small parks and other community-oriented activity facilities • A focal point of regional commerce, identity and activity, Regional Centers generally will fall within the range of floor area ratios from 1.5:1 to 6.0:1, characterized by six- to 20-stories (or higher) buildings. Some will only be commercially oriented; others will contain a mix of residential and commercial uses. • Gasoline/automotive services which may also provide accessory uses such as retail, food stores, restaurants and/or take-out.	**Consistent**. The Project includes a hotel use (commercial overnight accommodations) and restaurant uses. The Project includes 114 hotel rooms, ground floor restaurant, and other hotel amenities.
Regional Centers	
GOAL 3F Mixed-use centers that provide jobs, entertainment, culture, and serve the region.	**Consistent.** The Project would include a hotel use that provides jobs.
Objective 3.10 Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	**Consistent.** The Project would include a hotel use that provides jobs.
Policy 3.10.1 Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6. Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and densities/intensities of uses permitted in any area shall be identified in the community	**Consistent.** According to Table 3-1, regional centers include hotels. According to Table 3-6, the Regional Center designation corresponds to the existing C4 and proposed C2 zone for the Project Site.

Goal, Objective, Policies	Discussion
plans.	
Policy 3.10.2 Accommodate and encourage the development of multi-modal transportation centers, where appropriate.	**Not Applicable.** The Project is not of a size or scale to be a multi-modal transportation center.
Policy 3.10.3 Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies 3.16.1 through 3.16.3, and provide adequate transitions with adjacent residential uses at the edges of the centers.	**Consistent.** The hotel and commercial uses would activate the Selma Avenue corridor adjacent to Cahuenga Boulevard's pedestrian-oriented uses.
Policy 3.10.4 Provide for the development of public streetscape improvements, where appropriate.	**Not Applicable.** The Project is not required to develop the public streetscape.
Policy 3.10.5 Support the development of small parks incorporating pedestrian-oriented plazas, benches, other streetscape amenities and, where appropriate, landscaped play areas.	**Not Applicable.** The Project does not have any open space that could be used for the development of a small park.
Policy 3.10.6 Require that Regional Centers be lighted to standards appropriate for nighttime access and use.	**Consistent.** The hotel and restaurant uses would include lighting typical for nighttime use and access.
General Plan, Chapter 3-Land Use, Regional Center: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm *Table: CAJA Environmental Services, February 2017.*	

Table 3.10-4
Hollywood Community Plan

Objective and Policies	Discussion
Objectives of the Plan	
Objective 1 To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area. To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.	**Consistent**. The Project coordinates development of the HCP area with that of the City through the Department of City Planning review and approval process. This applies consistent standards and compliance measures for development. The Project provides employment, and retail services in the HCP area and furthers the development of Hollywood as a major center of population, employment retail services and entertainment.
Objective 2 To designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities projected to the year 2010.	**Consistent**. The Project provides hotel and commercial uses that would accommodate the surrounding area beyond the Plan's projected year of 2010. The Project's FAR is more consistent with the area's existing urban character and more appropriate to accommodate existing activities and uses beyond the Plan's projected year of 2010.
Objective 3 To make provisions for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice. To encourage the preservation and enhancement of the varied and distinctive residential character of the community, and to protect lower density housing from the scattered intrusion of apartments. In hillside residential areas to: a. Minimize grading so as to retain the natural terrain and ecological balance. b. Provide a standard of land use intensity and population density which will be compatible with street capacity, public service facilities and utilities, and topography and in coordination with development in the remainder of the City.	**Not Applicable**. The Project proposes a 114 guest room hotel with ground floor restaurant, and other hotel amenities. While the hotel does not provide permanent housing, it provides short-term lodging for visitors and expands the opportunities for choice among visitors to the Hollywood area and region.
Objective 4 To promote economic well-being and public convenience through: a. Allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards. b. Designating lands for industrial development that can be so used without detriment to adjacent uses of other types, and imposing restrictions on the types and intensities of	**Consistent**. The Project provides hotel and restaurant uses. The proposed FAR is consistent with smart growth principles. It provides ground-floor restaurant uses near a transit corridor (Cahuenga Boulevard) and appropriately locates density near transit, thereby assisting with efforts to reduce VMT and to increase pedestrian walkability and other modes of

Objective and Policies	Discussion
industrial uses as are necessary for this purpose. c. Encouraging the revitalization of the motion picture industry. d. Recognizing the existing concentration of medical facilities in East Hollywood as a center serving the medical needs of Los Angeles.	transit. The Project does not include industrial uses and would not conflict with the motion picture industry (existing uses are not related to the industry). The Project will not affect the concentration of medical facilities in East Hollywood.
Objective 5 To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.	**Consistent**. As part of the building permit process, various City departments are consulted to provide clearance. The encouragement of open space and parks is not applicable to the Project.
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 LADOT. The Traffic Study found that with a TDM program, all impacts would be reduced to less than significance.
Objective 7 To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.	**Not Applicable**. The Project is an infill development surrounded by existing developments. There is no public open space on the Project Site. The Project Site does not block views or alter the natural character and topography of the mountainous parts of the area.
Land Use – Commerce – Standards and Criteria	
The commercial lands (including associated parking) designated by this Plan to serve residential areas are adequate to meet the needs of the projected population to the year 2010, as computed by the following standards: 1. 0.6 acres per 1,000 residents for commercial uses for neighborhood or convenience-type commercial areas; 2. 0.2 acres per 1,000 residents for commercial uses for community shopping and business districts, including service uses and specialized commercial uses.	**Not Applicable**. The standard was designed to meet the needs of the population through 2010. The Project would be operational after 2010. However, the Project would provide commercial uses and services (hotel use) in an active area of Hollywood.
Parking areas should be located between commercial and residential uses on the commercially-zoned properties where appropriate to provide a buffer, and shall be separated from residential uses by means of at least a solid masonry wall and landscaped setbacks.	**Consistent**. Parking would be contained within the building in subterranean parking levels as well as utilizing valet parking services to an off-site location (accommodated by parking structure as part of the permitted and

Objective and Policies	Discussion
	under construction Thompson Hotel Project at 1541 Wilcox Avenue).

Source: 1988 Hollywood Community Plan, pages HO-1 to HO-3: http://cityplanning.lacity.org/complan/pdf/HwdCpTxt.pdf
Table: CAJA Environmental Services, December 2017.

Table 3.10-5
Hollywood Redevelopment Plan

Goals	Discussion
1) Encourage the involvement and participation of residents, business persons, property owners, and community organizations in the redevelopment of the community.	**Consistent**. The Project would redevelop an underutilized parcel with a hotel and restaurant development.
2) Preserve and increase employment, and business and investment opportunities through redevelopment programs and, to the greatest extent feasible, promote these opportunities for minorities and women.	**Consistent**. The Project would increase employment and business opportunities to all by providing a commercial development that provides jobs. The Project proposes a 114 guest room hotel with ground floor restaurant, and other hotel amenities.
3) Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.	**Consistent**. The Project would provide services and lodging. The Project proposes a 114 guest room hotel with ground floor restaurant, and other hotel amenities.
4) Support and encourage the development of social services with special consideration given to participating in projects involving community based organizations that serve runaways, the homeless, senior citizens and provide child care services and other social services.	**Not Applicable**. The Project proposes a 114 guest room hotel with ground floor restaurant, and other hotel amenities. The Project is a private development and not for social services.
5) Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as: a) adopting land use standards; b) promoting architectural and urban design standards including: standards for height, building setback, continuity of street facade, building materials, and compatibility of new construction with existing structures and concealment of mechanical appurtenances; c) promoting landscape criteria and planting programs to ensure additional green space; d) encouraging maintenance of the built environment; e) promoting sign and billboard standards; f) coordinating the provision of high quality public improvements; g) promoting rehabilitation and restoration guidelines; h) integrate public safety concerns into planning efforts.	**Consistent**. The Project would redevelop an underutilized parcel and promote a positive image of Hollywood and the environment with thoughtful design that fits into the character of the area. The Project proposes a 114 guest room hotel with ground floor restaurant, and other hotel amenities.

Goals	Discussion
6) Support and promote Hollywood as the center of the entertainment industry and a tourist destination through the retention, development and expansion of all sectors of the entertainment industry and the preservation of landmarks related to the entertainment industry.	**Not Applicable**. The Project does not affect any sector of the entertainment industry or landmark. The Project proposes a 114 guest room hotel with ground floor restaurant, and other hotel amenities.
7) Promote the development of Hollywood Boulevard within the Hollywood commercial core as a unique place which: a) reflects Hollywood's position as the entertainment center; b) provides facilities for tourists; c) contains active retail and entertainment uses at the street level; d) provides for residential uses; e) is pedestrian oriented; f) is a focus for the arts, particularly the performing arts; and g) recognizes and reinforces its history and architecture.	**Not Applicable**. The Project is located on Selma Avenue, approximately 650 feet south of Hollywood Boulevard.
8) Promote and encourage the retention and expansion of all segments of the arts community and the support facilities necessary to foster the arts and attract the arts through land use and development policies such as the creation of a theater district.	**Not Applicable**. The Project proposes a 114 guest room hotel with ground floor restaurant, and other hotel amenities. The Project would not be an arts or theater project.
9) Provide housing choices and increase the supply and improve the quality of housing for all income and age groups, especially for persons with low and moderate incomes; and to provide home ownership opportunities and other housing choices which meet the needs of the resident population.	**Not Applicable**. The Project proposes short-term lodging as guest rooms in a hotel. The Project would be removing four units, which is a negligible amount that would not displace a substantial number of people.
10) Promote the development of sound residential neighborhoods through mechanisms such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, traffic and circulation programming, development of open spaces and other support services necessary to enable residents to live and work in Hollywood.	**Not Applicable**. The Project proposes short-term lodging as guest rooms in a hotel. The Project does not propose permanent housing.
11) Recognize, promote and support the retention, restoration and appropriate reuse of existing buildings, groupings of buildings and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria.	**Not Applicable**. The Project is not retaining an existing building.

Goals	Discussion
12) Support and encourage a circulation system which will improve the quality of life in Hollywood, including pedestrian, automobile, parking and mass transit systems with an emphasis on serving existing facilities and meeting future needs.	**Consistent**. This MND studied the traffic generated by the Project and found no significant impacts.
13) Promote and encourage the development of health, education, child and youth care, and senior citizen facilities and programs to enable the development of a community with a variety of lifestyles.	**Not Applicable**. The Project proposes a 114 guest room hotel with ground floor restaurant, and other hotel amenities. The Project does not include those uses.
14) Promote and encourage development of recreational and cultural facilities and open spaces necessary to support attractive residential neighborhoods and commercial centers.	**Not Applicable**. The Project proposes a 114 guest room hotel with ground floor restaurant, and other hotel amenities. The Project does not include those uses.
15) Promote the development of the varied ethnic communities in Hollywood.	**Not Applicable**. The Project proposes a 114 guest room hotel with ground floor restaurant, and other hotel amenities. The uses would be open to all persons.
16) To the maximum extent feasible, seek to build replacement housing within the Project Area prior to the destruction or removal of dwelling units which house low and moderate income people. The Agency shall make a good faith effort to relocate displacees within the Project Area unless they choose to relocate elsewhere. Project displacees shall be provided a priority for occupancy in housing which the Agency has facilitated.	**Not Applicable**. The Project provides short-term lodging as part of the hotel. It does not provide permanent housing. The Project would be removing four units, which is a negligible amount that would not displace a substantial number of people. The Project complied with all applicable relocation requirements under LMAC and State law.
Source: Hollywood Redevelopment Plan: http://www.crala.org/internet-site/Projects/Hollywood/upload/HollywoodRedevelopmentPlan.pdf *Table: CAJA Environmental Services, December 2017.*	

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 the City was developed with structures prior to the MRZ-2 classification and, therefore, these sites are unavailable for extraction.[137]

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.[138] 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 will 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 Boulevard, east of Beverly Hills Drive, and west of Vine Street.[139] The California Department of Conservation has online mapping of wells. No oil wells exist on the Project Site.[140]

Original Baseline

Under the Original Baseline, the Project will not result in the loss of availability of a known mineral resource that would be of value to the region. Therefore, no impacts to mineral resources of regional or statewide significance will occur.

Current Baseline

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

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

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

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

Under the Current Baseline, the Project will not result in the loss of availability of a known mineral resource that would be of value to the region. Therefore, no impacts to mineral resources of regional or statewide significance will occur.

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.

Original Baseline

Under the Original Baseline, the Project will not 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. Therefore, no impacts to loss of availability of a locally important mineral resource will occur.

Current Baseline

Under the Current Baseline, the Project will not 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. 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 items, included as Appendix H of this IS/MND:

H Noise Appendices, DKA Planning, October 2017.

C-2 Original Baseline Air Quality, Greenhouse Gases, and Noise Appendices, DKA Planning, September 2015. (Note: Analyzed the Original Baseline for the Adopted MND).

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 Impact. 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. *Table 3.12-1* provides examples of A-weighted noise levels from common sources.

Table 3.12-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35
Source: United States Occupational Safety & Health Administration, Noise and Hearing Conservation Technical Manual, 1999.	

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.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.[141] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[142]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA L_{eq}, and that individual noise events of 45 dBA or higher be limited.[143] Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA L_{eq}. Individual exterior events of 60 dBA or higher should also be limited.

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65-70 dBA L_{eq} and cardiovascular effects including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

Audible Noise Changes

[141] *National Institute on Deafness and Other Communication Disorders, www.nidcd.nih.gov/health/noise-induced-hearing-loss.*

[142] *World Health Organization, Guidelines for Community Noise, 1999.*

[143] *Ibid.*

People with normal hearing sensitivity can recognize small perceptible changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable. Sound level increases of 10 dBA or greater are perceived as a doubling in loudness.[144]

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, an unobstructed visual path between noise source and receptor. Barriers such as walls or buildings that break line-of-sight between sources and receivers can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can reduce source noise levels by up to 20 dBA or more.[145] However, the effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Regulatory Setting

Federal

Currently, no federal noise standards regulate environmental noise associated with short-term construction activities or the long-term operations of development projects. As such, temporary and long-term noise impacts produced by the Project would be largely regulated by and evaluated with respect to state and City standards designed to protect public well-being and health.

State

The State of California's 2003 General Plan Guidelines establish county and city guidelines for acceptable exterior noise levels based on land use. These standards and criteria are incorporated into the land-use planning process to reduce future noise and land-use incompatibilities. *Table 3.12-2* illustrates state guidelines on considering the compatibilities between various land uses and outdoor noise levels.

[144] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.*

[145] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*

Table 3.12-2
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								
				CA				
					CU			
Sports Arenas, Outdoor Spectator Sports								
				CA				
					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.

City of Los Angeles

Construction Noise Standards

LAMC contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations. For example, LAMC Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 PM and 7:00 AM, Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 AM or after 6:00 PM on any Saturday, or on any Sunday or national holiday.

> *LAMC SEC. 41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.*
>
> *(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.*
>
> *(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific...*

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance to Project construction would be subdivision (a), which institutes a maximum noise limit of 75 dBA for the types of construction vehicles and equipment that would be necessary for Project demolition and grading, especially. However, the LAMC goes on to note that these limitations would not necessarily apply if proven that the Project's compliance therewith would be technically infeasible despite the use of noise-reducing means or methods.

> *LAMC SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS*
>
> *Between the hours of 7:00 A.M. and 10:00 P.M., 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 therefrom:*
>
> *(a) 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;*
>
> *(b) 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;*
>
> *(c) 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.*
>
> *Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.*

LAMC Section 112.01 would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the Project's property line.

> *LAMC SEC. 112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES*
>
> *(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.*
>
> *(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.*

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

LAMC Section 112.02(a), below, would prevent Project HVAC systems and other mechanical equipment from elevating ambient noise levels at neighboring residences by more than 5 dBA.

LAMC SEC.112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

(a) It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property ... to exceed the ambient noise level by more than five decibels.

L.A. CEQA Thresholds Guide

In 2006, the City released the *L.A. CEQA Thresholds Guide* to provide further guidance for the determination of significant construction and operational noise impacts. According to the *L.A. CEQA Thresholds Guide*, a project would, under normal circumstances, have a significant impact if:

- *Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;*
- *Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or*
- *Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.*

For a project's operational impacts:

- *The ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category...*
- *Any 5 dBA or greater noise increase.*

Existing Conditions

On April 25, 2017, DKA Planning took short-term noise readings at locations surrounding the Project Site to determine these receptors' ambient noise conditions.[146] For all noise monitoring locations, ambient

[146] *Noise measurements were taken using a Quest Technologies SoundPro DL Sound Level Meter. The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.*

noise was primarily attributable to vehicle traffic along Wilcox Avenue, Selma Avenue, and Cahuenga Boulevard. Ambient noise levels for all monitoring locations are shown in *Table 3.12-3* for reference.

Table 3.12-3
Existing Ambient Noise Levels

Noise Monitoring Location	Existing Ambient Noise Level (dBA Leq)
1. Intersection of Wilcox Avenue and Selma Avenue	69.3
2. Selma Avenue	67.1
3. Cahuenga Boulevard	70.5
Source: DKA Planning, 2017.	

These ambient conditions are largely similar to those recorded in 2015 as a part of the Approved Project's environmental analysis. That analysis determined the ambient noise level near the intersection of Wilcox Avenue and Selma Avenue to be 66.9 dBA L_{eq}. A noise measurement along Selma Avenue yielded an ambient noise level of 64.3 dBA L_{eq}. Along Cahuenga Boulevard near Cosmo Lofts, an ambient noise level of 70.3 dBA L_{eq} was recorded. When compared with the ambient noise levels of their corresponding locations that were recorded in April 2017, these noise levels differ by less than 3 dBA. The Project would not have a significant construction noise impact at any nearby receptor, no matter which baseline ambient noise measurements are considered.

Establishing the existing noise environment was complicated by two factors. First, the proposed Project would add to approved development on a site that is actively under construction. The Project Site is entirely excavated to the depth of the planned three-level subterranean parking garage. As a result, noise monitoring equipment could not be safely positioned on-site and at-grade. Second, ongoing construction activities at the site would distort ambient noise conditions.

Because of these complications, DKA Planning established an ambient 24-hour CNEL noise profile through a two-step process. First, it took periodic noise measurements throughout the day at an off-site location immediately adjacent to the Project Site, near the intersection of Selma Avenue and Wilcox Avenue. These measurements were not taken at times when construction equipment was in operation. The results of these noise measurements are shown in Table 3.12-4. Because of the area's increased noise levels associated with nightlife (e.g., bars, late-operating restaurants, clubs), late evening noise levels were measured on a Friday night (August 4, 2017 at 10:42 PM) and extending into early Saturday morning (August 5, 2017 12:31 AM) to establish a conservative noise profile. This nightlife generates noise from increased pedestrian activity and increased traffic (especially from taxi, Uber, and Lyft drop-offs and pick-ups).

Noise from amplified bar, restaurant, and club music was generally not audible over the din of transportation noise sources, which, being mostly low-frequency in nature themselves, tended to mask any muffled or distant amplified club noise from indoor or rooftop sources. Amplified noises from indoor

sources were typically only intermittently audible when doors to clubs or restaurants were opened. Amplified noises from rooftop sources were only somewhat audible over street-level pedestrian and vehicle noises, particularly when traffic at the intersection of Wilcox Avenue and Selma Avenue was at a standstill due to gridlocking. Second, it used this data to represent ambient noise levels in five time bins to construct a 24-hour CNEL noise level. Table 3.12-5 shows how these measurements were utilized to construct a projected CNEL value.

The greatest contributing factors to the area's 73.1 CNEL are elevated late-evening (10:00 P.M. – 2:00 A.M.) noise levels that are further penalized by a +10 dBA CNEL adjustment. As discussed earlier, this adjustment accounts for people's increased sensitivities to noise during evening and early morning hours and penalizes noise that could compromise healthy sleeping environments.

Table 3.12-4
Existing Community Noise Levels

Time Period	Existing Ambient Noise Level (dBA L_{eq})
Early Morning (5:17 A.M. – 6:50 A.M.)	60.8
Daytime (1:48 P.M. – 1:58 P.M.)	69.3
Early Evening (8:11 P.M. – 8:21 P.M.)	66.9
Late Evening (10:42 P.M. – 12:31 A.M.)	68.4
Source: DKA Planning, 2017.	

Table 3.12-5
CNEL Noise Levels

Time Period	Noise Level (dBA L_{eq})	CNEL Adjustment	CNEL Noise Level
12:00 A.M. – 2:00 A.M.	68.4	+10	78.4
2:00 A.M. – 7: 00 A.M.	60.8	+10	70.8
7:00 A.M. – 7:00 P.M.	69.3	+0	69.3
7:00 P.M. – 10:00 P.M.	66.9	+5	71.9
10:00 P.M. – 12:00 A.M.	68.4	+10	78.4
24 Hour CNEL Value	N/A	N/A	**73.1**
Source: DKA Planning, 2017.			

The existing noise environment for development in the vicinity of the Project varies by land use. As summarized in Table 3.12-6, existing CNEL noise levels range from being conditionally acceptable to normally unacceptable under the City's General Plan, which has adopted the State's land use compatibility matrix (shown in Table 12-2). Uses falling under the "Office Buildings, Business and Professional Commercial" category currently experience a "conditionally acceptable" noise environment.

According to State and General Plan guidance, a noise environment up to 77 CNEL would be considered acceptable for these uses. As noted earlier, the CNEL community noise levels in the area are largely a product of elevated late evening noise levels that are heavily penalized by adjustments that account for humans' nighttime and early morning sensitivities to noise.

Hotels in the Project's vicinity currently experience a "normally unacceptable" noise environment. However, the elevated late evening noise levels that contribute to this environment are, to a large degree, a product of the nightlife that these hotels generate and benefit from themselves. The environmental conditions at the Project Site are not "normally unacceptable" for these hotels as the City's General Plan would suggest, but conducive for boutique hotels with a focus on nightlife and high-quality dining.

As shown in Table 3.12-6, Avenue and the Hollywood Walk-In Clinic are not easily categorized by State and City land use descriptions. However, it is unlikely that these uses are negatively impacted by the area's existing noise conditions. Avenue is a bar/lounge that operates Tuesdays, Fridays, and Saturdays from 10:30 PM to 2:00 AM the following day. It hosts parties and events with loud amplified music and is unlikely to be affected by elevated community noise conditions. Hollywood Walk-In Clinic is open daily from 8:00 AM to 8:00 PM on weekdays and from 9:00 AM to 5:00 PM on weekends. As a result, it also would not be affected by the area's elevated nighttime noise levels. It does not house overnight patients, as hospitals and nursing homes do.

Table 3.12-6
Existing Noise/Land-Use Compatibility

Receiver	Land Use Description	Acceptable?†	Existing CNEL Range
U.S. Post Office, Hollywood Station	Office Buildings, Business and Professional Commercial	CA	67 - 77
Mama Shelter Hotel	Transient Lodging – Motels, Hotels	NU	70 – 80
Gilbert Hotel	Transient Lodging – Motels, Hotels	NU	70 – 80
Hollywood Walk-In Clinic	N/A	N/A	N/A
Concept Arts Studio	Office Buildings, Business and Professional Commercial	CA	67-77
The Record Parlour	Office Buildings, Business and Professional Commercial	CA	67-77
Floyd's 99 Barbershop	Office Buildings, Business and Professional Commercial	CA	67-77
Avenue (Bar/Lounge)	N/A	N/A	N/A
Dream Hotel	Transient Lodging – Motels, Hotels	NU	70-80
Mark Twain Hotel	Transient Lodging – Motels, Hotels	NU	70-80

Table 3.12-6
Existing Noise/Land-Use Compatibility

Receiver	Land Use Description	Acceptable?†	Existing CNEL Range
† NA = Normally Acceptable CA = Conditionally Acceptable NU = Normally Unacceptable CU = Clearly Unacceptable			
Source: DKA Planning, 2017.			

Construction Noise Impacts

Though the Project Site is located in a dense urban environment with high ambient noise levels, there are a number of noise-sensitive receptors in the vicinity of the Project Site. According to the *L.A. CEQA Thresholds Guide*, land uses sensitive to noise include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The following receptors were chosen specifically for detailed construction noise impact analysis given their potential sensitivities to noise and their proximity to the Project Site:

- Hollywood Walk-In Clinic - This medical receptor is located at 6430 Selma Avenue, approximately 60 feet south of the Project Site.

- Jay Silverman Productions - This media receptor consists of studios that may be sensitive to the Project's construction noises. Jay Silverman Productions is located at 1541 Cahuenga Boulevard, and its closest studio is approximately 110 feet south of the Project Site.

- Cosmo Lofts - This multi-family residence is located at 1617 Cosmo Street, approximately 350 feet east of the Project Site.

During all construction phases, noise-generating activities could occur at the Project Site between the hours of 7:00 AM and 9:00 PM Monday through Friday, in accordance with LAMC Section 41.40(a). Noise from demolition and grading activities are typically the foremost concern when evaluating a project's construction noise impacts, as these activities often require the use of heavy-duty, diesel-powered earthmoving equipment. However, because the Project would be constructed on top a portion of a previously constructed and built structure, its buildout would not require any demolition, grading, or excavation activities. Instead, the bulk of the Project's construction noises would result from the operation use of welders and other various electric and pneumatic handheld tools. Welding activities can produce average noise levels of 70.0 dBA L_{eq} at a reference distance of 50 feet.[147] Tools such as radial saws and handheld drills can produce peak noise levels of up to 80 dBA at a reference distance of three

[147] *Reference noise level obtained from the Federal Highway Administration's Roadway Construction Noise Model.*

feet.[148] Noise from truck-mounted cranes and forklifts would be intermittent and not capable of substantially raising ambient noise levels at nearby receptors.

For this Project, noise impacts were modeled using the noise reference levels of welding equipment, as welding activities would have the greatest potential to cause sustained and significant noise impacts at nearby receptors. The impacts of other construction tools and equipment would be neither as loud nor as extensive over the duration of the Project's buildout. Therefore, this analysis examines a worst-case-scenario; the noise impacts of all other construction activities would not exceed the impacts analyzed here. The projected noise impacts from welding activities are shown in *Table 3.12-7* and summarized below.

Table 3.12-7
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
Hollywood Walk-In Clinic	60	68.4	69.3	71.9	2.6
Jay Silverman Productions	110	63.2	67.1	68.6	1.5
Cosmo Lofts	350	48.1	70.5	70.5	< 0.1
Source: DKA Planning, 2017.					

- Hollywood Walk-In Clinic - This receptor is projected to experience exterior noise levels of up to 71.9 dBA L_{eq} as a result of the Project's welding activities, an increase of 2.6 dBA over existing ambient noise conditions. This would not exceed the 5 dBA noise increase threshold considered to be a significant impact by the *L.A. CEQA Thresholds Guide* for construction activities lasting more than ten days in a three-month period.

- Jay Silverman Productions - This receptor is projected to experience exterior noise levels of up to 68.6 dBA L_{eq} as a result of the Project's welding activities, an increase of 1.5 dBA over existing ambient noise conditions. This also would not exceed the 5 dBA noise increase threshold considered to be a significant impact by the *L.A. CEQA Thresholds Guide* for construction activities lasting more than ten days in a three month period.

- Cosmo Lofts - This receptor is not projected to experience any tangible increase in noise as a result of the Project's welding activities.

[148] *Environmental Protections Agency (EPA); Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances; 1971.*

Earlier, it was noted that the Project would not result in a significant construction impact at any nearby receptor even if older 2015 baseline ambient noise measurements were utilized. Table 3.12-8 shows the projected construction noise impact of the Project with the incorporation of the older baseline figures. As shown, no receptor would experience temporary noise increases in excess of 5 dBA.

Table 3.12-8
Construction Noise Levels – Unmitigated Ambient Noise Levels

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Hollywood Walk-In Clinic	60	68.4	66.9	70.7	3.8
Jay Silverman Productions	110	63.2	64.3	66.8	2.5
Cosmo Lofts	350	48.1	70.3	70.3	< 0.1

Existing ambient is from May 2015, used in the Approved MND.
New ambient is from April 2017, used for this Project.
Source: DKA Planning, 2017.

As discussed above, no receptor would experience construction-related noise increases in excess of 5 dBA as a result of the Project. The Project's construction equipment source noise levels would also not exceed LAMC Section 112.05's 75 dBA limit for powered construction equipment operating within 500 feet of residential zones. As a result, the Project's construction noise impact would be considered less than significant.

The Project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

The Project would not require additional demolition or excavation than what was previously analyzed in the Adopted MND. The Adopted MND included Mitigation Measures 12-1 to 12-6 to reduce construction noise impacts related to demolition and excavation equipment. The demolition and excavation of the Project Site was completed in compliance with the above referenced mitigation

measures which were adopted as part of the Adopted MND. The mitigation measure for the Approved Project has either been implemented or will be implemented as part of the Adopted MND.

The Adopted MND analyzed potential impacts for four sensitive receptors: Cosmo Lofts, Hollywood Walk-In Clinic, Jay Silverman Productions, and The Hotel Café. Due to a change in the surrounding environment, The Hotel Café was not analyzed as a sensitive receptor as part of this document. Subsequent to the approval of the Adopted MND, the Dream Hotel located at 6415 – 6419 West Selma Avenue, has completed construction. The Dream Hotel is a 10-story hotel, which is located between the Project Site and The Hotel Café, which is located at 1623 North Cahuenga Boulevard. Additionally, the use was considered a sensitive receptor because of show productions, which occurred on that site. However, in reviewing the event calendar for The Hotel Café, shows would not begin until 7:00 p.m. or later which is generally after construction hours. Due to the physical barrier of the Dream Hotel and the operations of The Hotel Café, it has been determined that the use would no longer be considered a sensitive receptor.

As shown in Table 3.12-7, compliance with existing noise regulations for the remaining construction phase of the Project under the Current Baseline is not anticipated to increase the ambient noise of the sensitive receptors beyond 5 dBA. As such, the previously adopted mitigation measures are not required to reduce the construction noise impacts to a less than significant level.

Original Baseline

Under the Original Baseline, during the construction of the Project, the Project would result in exposure of persons to or generation of noise levels in excess of standards established in the General Plan and/or City Noise Ordinance, resulting in noise impacts that are significant. Compliance with Mitigation Measures 12-1 through 12-6 from the Adopted MND would reduce construction noise to a level less than significant.

Current Baseline

Under the Current Baseline, during the construction of the Project, the Project would not result in exposure of persons to or generation of noise levels in excess of standards established in the General Plan and/or City Noise Ordinance, resulting in noise impacts that are less than significant. No mitigation measures are required.

Operational Phase Noise Impacts

During Project operations, the development would produce both direct noise impacts on the Project Site from hotel- and commercial-related activities, as well as indirect noise impacts from vehicles traveling on local roads to access the Project Site. The direct impacts would include:

Mechanical Equipment - The use of mechanical equipment to operate the on-site facilities include HVAC equipment, pool pumps, and filtration systems. As discussed earlier, regulatory compliance with LAMC Section 112.02 would ensure that noises from sources do not increase ambient noise levels at neighboring

occupied properties by more than 5 dBA. When measuring noise levels near the Project Site, HVAC noises were only audible during early morning hours (before 7:00 A.M.) with limited traffic noises. The source of these noises was attributable to rooftop systems on lower-rise buildings, specifically Gilbert Hotel and the Hollywood Walk-In Clinic. HVAC noises from the nearby Dream Hotel and Mama Shelter Hotel were not audible. It is unlikely that noises from the Project's HVAC systems would contribute to noticeable off-site increases in noise levels, even during early morning hours. Their effect on 24-hour noise levels would be nominal at most, as HVAC-related noises would be inaudible for the majority of any 24-hour cycle due to elevated existing ambient noise levels in the Project's vicinity.

LAMC Section 112.02 would also apply to rooftop pool pumping and filtration systems. When measuring noise levels near the Project Site, pool-related noises from the nearby Dream Hotel were not audible at any time. Though the pool deck of the Project would be located at a lower height than the Dream Hotel's rooftop pool deck, it is also unlikely that noises from the Project's pool systems would contribute to noticeable off-site increases in noise levels, even during early morning hours. As with HVAC systems, the effect of pool equipment noises on 24-hour noise levels would be nominal at most, as related noises would be inaudible for the majority of any 24-hour cycle due to elevated existing ambient noise levels in the vicinity.

Hotel Land Uses - Most noise generated by the proposed uses would be internal, and audibility would be mostly confined to within the Project itself. As discussed above, any ambient music for the Project's rooftop amenity deck and bar areas would comply with LAMC Section 112.01, subdivision (b), which regulates amplified noises within residential zones, or within 500 feet thereof. Compliance would prevent amplified music from being audible to the human ear at a distance "in excess of 150 feet from the property line of the noise source." However, given the high ambient noise levels of the Project area, it is unlikely that ambient music from the Project would be audible at any off-site receptors.

Rooftop Deck - The Project would include a 5,807 square feet rooftop uses, including a pool, roof deck and bar area with related seating totaling 73 that could generate intermittent and/or seasonal noise . This rooftop area could host events including DJ performances with amplified music. As discussed earlier, when measuring noise levels on a Friday evening, noise from simultaneous rooftop events at the nearby Mama Shelter Hotel and Dream Hotel were not substantially audible at street level over pedestrian and transportation noises. Though the Dream Hotel's rooftop deck is approximately 20 feet higher than that proposed by the Project, while the Mama Shelter Hotel's rooftop deck is approximately 25 feet lower in height. The Project's rooftop deck would also include a glass or heavy plastic safety wall around its perimeter, which would be capable of attenuating rooftop noises and re-directing the transmission of these noises back inward and away from adjacent land uses. This is included as **Project Design Feature PDF-Noise-1**.

These factors strongly suggest that any similar rooftop events hosted on the Project's roof-top deck would not contribute to substantially audible, let alone significant, noise increases at adjacent land uses. Instead, the greatest noise impacts from the rooftop and other Project events would likely result from secondary noises such as increased pedestrian activity around the Project, as well as increased patron and valet traffic to and from the Project. Off-site noise impacts from Project traffic are analyzed separately below.

Restaurant Uses - Noises from indoor areas would be internally contained, and audibility would be confined to within the Project itself. Regarding the ground-floor restaurant's outdoor seats, it is unlikely that conversation from patrons would be capable of substantially increasing noise levels at any nearby uses, especially as these seats would be located at the corner of Selma Avenue and Wilcox Avenue, a relatively busy intersection with elevated existing ambient noise levels. Voice noise levels in face-to-face conversation generally increase proportionally to background ambient noise levels, but only up to approximately 67 dBA at a reference distance of 1 meter.[149] As nearby land uses are located greater than 50 feet away, it is unlikely that off-site noise levels from the restaurant's outdoor seating area would be capable of increasing the area's existing ambient noise conditions.

The Adopted MND included Mitigation Measure 12-7, which applies to the existing restaurant. The mitigation measure for the Approved Project has either been implemented or will be implemented as part of the Adopted MND. The measure is not required for the Project.

Auto-Related Activities - Operational noises related to the proposed on-site parking would include intermittent noise events such as door slamming and vehicle engine start-ups. However, the Project's parking consists of three underground levels. In addition, the off-site parking would be contained in an under construction parking structure as part of the Thompson Hotel. Related noises would therefore be internally contained and substantially attenuated at nearby receptors. The noise related to valet operation at the street level would be minimal and represent the typical noises for on-site street and meter parking. Vehicles would be dropped off and efficiently routed to the on-site or off-site parking areas.

These direct sources of on-site noise would generate impacts on a seasonal, irregular, or infrequent basis and would not individually or collectively elevate ambient noise levels substantially at nearby sensitive receptors. The potential noise impact from these on-site operational sources would be considered less than significant.

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with its net new daily trips. On a typical weekday, the Project is forecast to generate an estimated 1,227 net new daily trips, including 70 net new AM peak hour trips and 100 net new PM peak hour trips.[150] This includes additional trips that would be generated by the Project's valet services, which would transport patron vehicles to and from an off-site parking facility located on Wilcox Avenue.

The noise impact of these vehicle trips was modeled using the Federal Highway Administration's (FHWA) Traffic Noise Model 2.5 (TNM 2.5). This noise prediction software uses traffic volumes, vehicle mix, average speeds, roadway geometry, and other inputs to calculate average noise levels along inputted roadway segments. For this analysis, an existing year (2017) no project scenario was compared to an existing year with project scenario. The baseline for these existing year scenarios includes traffic data that represents the approved and constructed restaurant, as well as the retail use, which is currently

[149] *Environmental Protection Agency, Speech Levels in Various Noise Environments, May 1977.*

[150] *Overland Traffic Consultants, Partial Off-Site Parking & Valet Service Evaluation LADOT Letter, October 2017.*

under construction. *Table 3.12-9* show the Project's projected contributions to ambient noise level increases along modeled roadway segments. As shown, Project-related traffic would, individually, have a negligible impact on roadside ambient noise levels in the Project's vicinity. This impact would be considered less than significant.

Table 3.12-9
Existing Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, L_{eq} 1hr			
		No Project (2017)	With Project (2017)	Project Change	Significant Impact?
N/B Wilcox Ave., S of Selma Ave.	AM	68.2	68.2	<0.1	No
	PM	70.3	70.4	0.1	No
S/B Wilcox Ave., S of Selma Ave.	AM	68.2	68.2	< 0.1	No
	PM	68.5	68.6	0.1	No
E/B Selma Ave., W of Wilcox Ave.	AM	71.0	71.1	0.1	No
	PM	73.8	74.0	0.2	No
W/B Selma Ave., W of Wilcox Ave.	AM	73.1	73.2	0.1	No
	PM	73.5	73.6	0.1	No
Source: DKA Planning, 2017.					

Project Design Feature

PDF-Noise-1 The rooftop deck would include a glass or heavy plastic safety wall (minimum 6 feet in height) around its perimeter.

Original Baseline

Under the Original Baseline, during the operation of the Project, the Project would not result in exposure of persons to or generation of noise levels in excess of standards established in the General Plan and/or City Noise Ordinance, resulting in noise impacts that are less than significant. No mitigation measures are required. **PDF-Noise-1** would be implemented to attenuate rooftop noises and re-direct the transmission of these noises back inward and away from adjacent land uses.

Current Baseline

Under the Current Baseline, during the operation of the Project, the Project would not result in exposure of persons to or generation of noise levels in excess of standards established in the General Plan and/or City Noise Ordinance, resulting in noise impacts that are less than significant. No mitigation measures are

required. **PDF-Noise-1** would be implemented to attenuate rooftop noises and re-direct the transmission of these noises back inward and away from adjacent land uses.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

Vibration Definitions

Peak particle velocity (PPV) is defined as the maximum instantaneous peak of a vibration signal; it is usually measured in inches per second. PPV can be used to describe vibration impacts to buildings and humans.[151]

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually 50 root-mean-square (RMS) or lower, well below the threshold of perception for humans, which is around 65 RMS.[152] 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, Caltrans has published guidance relating to structural vibration impacts. According to Caltrans, modern industrial/commercial buildings and new residential structures can be exposed to continuous ground-borne vibration levels of 0.5 inches per second without

[151] *Caltrans. Transportation and Construction Vibration Guidance Manual, September 2013.*

[152] *Caltrans. Transportation and Construction Vibration Guidance Manual, September 2013.*

experiencing structural damage.[153] In terms of construction-related impacts on buildings, the City has not adopted policies or guidelines relative to ground-borne 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 ground-borne vibrations from long-term operational activities, not construction. Consequently, as both the City and the County of Los Angeles do not have a significance threshold to assess vibration impacts during construction, Caltrans's adopted vibration standards for buildings are used to evaluate potentially damaging structural impacts related to Project construction. *Table 3.12-10* identifies Caltrans's building damage significance thresholds. The City has not adopted any thresholds associated with land-use disruption caused by ground-borne vibration.

Table 3.12-10
Building Damage Vibration Thresholds

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: California Department of Transportation, 2013.		

Construction Vibration Impacts

As construction for the Project would not require equipment such as heavy diesel-powered earthmoving vehicles or pile drivers, it would not generate excessive or potentially damaging levels of groundborne vibration.[154] Vibration from construction vehicles such as delivery vehicles and flatbeds would be intermittent and not capable of damaging any nearby structures. As a result, the Project's vibration impact would be considered less than significant.

A portion of the Approved Project consisted of the demolition of existing structures and the excavation of approximately 18,000 cubic yards of dirt on the western portion of the Project Site. In analyzing the potential impacts of the Approved Project as it related to ground-borne vibration or ground-borne noise levels, it was determined that the only construction activity that may have an impact was the hauling of

[153] *Caltrans. Transportation and Construction Vibration Guidance Manual, September 2013.*

[154] *The Adopted MND previously analyzed the effects of demolition, excavation, and construction for the Original Baseline. See Section 2, Project Description, of this MND, for additional details.*

demolition-related materials. The impacts were determined to be less than significant with the implementation of Mitigation Measure 12-6. This mitigation measure for the Approved Project has either been implemented or will be implemented as part of the Adopted MND.

The demolition and excavation, which was analyzed as part of the Adopted MND was related to the western portion of the Project Site. Structures on the western portion of the site have since been demolished and the site has been excavated to a depth of approximately 33 feet. As such, no further demolition or excavation is anticipated as part of the Project and impacts as it relates to ground-borne vibration or ground-borne noise levels would be less than significant.

Original Baseline

Under the Original Baseline, construction of the Project would not result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels, resulting in impacts that are less than significant.

Current Baseline

Under the Current Baseline, construction of the Project would not result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels, resulting in impacts that are less than significant.

Operation Vibration Impacts

During Project operations, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Operational ground-borne vibration in the Project's vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. Project-related traffic would expose nearby land uses and other sensitive receptors to vibrations far below levels associated with human annoyance or land-use disruption. As a result, the Project's long-term vibration impacts would be considered less than significant.

Original Baseline

Under the Original Baseline, operation of the Project would not result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels, resulting in impacts that are less than significant.

Current Baseline

Under the Current Baseline, operation of the Project would not result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels, resulting in impacts that are less than significant.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact.

The majority of the Project's long-term noise impacts would come from traffic traveling to and from the Project. This, the addition of future traffic from any new developments in the Project area, and overall ambient traffic growth would elevate ambient noise levels surrounding local roadways. As shown in *Table 3.12-11*, this could increase noise levels along Selma Avenue, west of Wilcox Avenue, by 3.3 dBA during the AM peak hour. The 3.0 dBA increase along this same roadway segment during the P.M. peak hour would also be potentially noticeable.

However, the Project's individual contribution to this offsite ambient noise level increase would be minimal; ambient noise levels along this segment are projected to raise by this degree with or without the buildout of the Proposed Project. Given the state of development in the Project area, traffic from approved projects alone would raise peak hour ambient noise levels by 3.2 dBA (AM peak) and 2.9 dBA (PM peak) along this segment.

Additionally, these peak hour ambient noise level increases are not likely to correspond with more than a 3 dBA increase in 24 hour CNEL because project and related project traffic impacts during non-peak hours of travel, such as during mid-day or early morning hours, would not increase ambient noise levels along this segment by such a degree. Therefore, this roadway segment would not be expected to experience a daily ambient noise increase greater than 3 dBA CNEL. Other road segments would experience lesser ambient noise increases. As a result, the Project's cumulative operational noise impact would be considered less than significant.

Original Baseline

Under the Original Baseline, the Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the Project. Therefore, the cumulative operation impacts would be less than significant.

Current Baseline

Under the Current Baseline, the Project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the Project. Therefore, the cumulative operation impacts would be less than significant.

Table 3.12-11
Future Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, L_{eq} 1hr				
		Existing (2017)	No Project (2020)	With Project (2020)	Total Change	Significant Impact?
N/B Wilcox Ave., S of Selma Ave.	AM	68.2	70.0	70.0	1.8	No
	PM	70.3	71.9	71.9	1.6	No
S/B Wilcox Ave., S of Selma Ave.	AM	68.2	69.4	69.5	1.3	No
	PM	68.5	69.9	69.9	1.4	No
E/B Selma Ave., W of Wilcox Ave.	AM	71.0	74.2	74.3	3.3	No
	PM	73.8	76.6	76.7	2.9	No
W/B Selma Ave., W of Wilcox Ave.	AM	73.1	75.0	75.0	1.9	No
	PM	73.5	76.4	76.5	3.0	No
Source: DKA Planning, 2017.						

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 Impact. As discussed earlier, construction activities would temporarily increase ambient noise levels at nearby receptors. Any other future developments that are built concurrently with the Project could further contribute to these temporary increases in ambient noise levels. However the nearest such project, a hotel located adjacent to the Project site at 6417 Selma Avenue, is finished construction and in operation as of summer 2017, prior to Project-related construction activities. Given the high ambient noise levels in the Project's vicinity, it is unlikely that construction noises from other concurrent developments would be capable of contributing to cumulatively considerable noise increases at nearby receptors. Persistent traffic noise would mask any distant construction sounds in a manner largely similar to the effects of white noise, and the presence of numerous multi-story structures would further obstruct these sounds' line of sight travel. The Project's construction activities would not be expected to contribute substantially to any cumulative construction noise impacts, especially because the Project would not require the use of heavy diesel-powered grading vehicles such as scrapers or

excavators.[155] Given these considerations, the Project's potential to produce significant cumulative construction noise impacts at nearby sensitive receptors would be considered less than significant.

Original Baseline

Under the Original Baseline, the Project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the Project. Therefore, the impact would be less than significant.

Current Baseline

Under the Current Baseline, the Project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the Project. Therefore, the impact would be less than significant.

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.[156] The Project Site is not located within two miles of a public airport. The nearest airports are LAX located 11.5 miles southwest, Santa Monica Airport located 8.5 miles southwest, Bob Hope-Burbank Airport located 6.5 miles north.

Original Baseline

Under the Original Baseline, the Project would not expose future residents or employees to excessive airport-related noise levels. Therefore, no impact will occur.

Current Baseline

Under the Current Baseline, the Project would not expose future residents or employees to excessive airport-related noise levels. Therefore, no impact will occur.

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.

Original Baseline

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[155] *The Adopted MND previously analyzed the effects of demolition, excavation, and construction for the Original Baseline. See Section 2, Project Description, of this MND, for additional details. The Approved Project was required to comply with Mitigation Measures 12-1 through 12-6.*

[156] *City of Los Angeles, ZIMAS parcel search: http://zimas.lacity.org/.*

Under the Original Baseline, the Project would not expose future residents or employees to excessive noise levels from any private airstrip. Therefore, no impact will occur.

Current Baseline

Under the Current Baseline, the Project would not expose future residents or employees to excessive noise levels from any private airstrip. Therefore, no impact will occur.

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.

Original Baseline

Under the Original Baseline, the Project would not induce substantial population growth in an area, directly or indirectly, and the construction-related population growth impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not induce substantial population growth in an area, directly or indirectly, and the 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 zero residents and approximately 94 employees, at most.

Considering the Original Baseline, there would be a net removal of four residential units and approximately 12 residents, and net increase of approximately 82 employees.

Considering the Current Baseline, there would be no removal of residential units and net increase of approximately 94 employees. For purposes of analysis in this MND that is based on the employee

generation, we will use the worse-case number and not take credit of any existing uses or change in uses to present a more conservative analysis.[157]

Table 3.13-1
Project Estimated Population Generation

Land Use	Quantity	Population Generation Rates	Total Population
Existing (to be removed) under Original Baseline			
Residential (removed)	4 units	2.81 person / DU	(12)
Existing Uses under Current Baseline			
Residential (removed)	0 DU	2.81 person / DU	0
Project			
Residential	0 DU	2.81 person / DU	0
Total Increase in Population (from Original Baseline)			**(12)**
Total Increase in Population (from Current Baseline)			**0**

Note: DU = dwelling unit
Source: The 2010 Census also shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf.
Table: CAJA Environmental Services, February 2017.

Table 3.13-2
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees
Existing (to be removed) under Original Baseline			
Restaurant (removed)	3,174 sf	1 employee / 388 sf	(8)
Bar (removed)	1,650 sf	1 employee / 388 sf	(4)
Retail (removed)	Vacant	-	0
Existing (to be removed) under Current Baseline			
None	-	-	-
Project			
Hotel	55,000 sf	1.13 employees / 1,000 sf	73
Restaurant (first floor)	1,939 sf	388 sf / employee	4
Bar (first floor)	819 sf	388 sf / employee	2
Bar (rooftop)	5,807 sf	388 sf / employee	15
Total Increase in Employees (from Original Baseline)			**82**
Total Increase in Employees (from Current Baseline)			**94**

Note: sf = square feet
Source: LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table 11: Hotel is Lodging rate.
The Justification Study does not provide restaurant rates. Restaurant is based on Employee Density Study Summary Report, October 2001, Prepared for SCAG.
Table: CAJA Environmental Services, December 2017.

[157] *Tao restaurant employees were calculated in the Adopted MND and are not included as part of this Project.*

The December 2016 unemployment rate is Los Angeles-Long Beach-Glendale area is approximately 4.7 percent.[158] Thus, there is still potential for employment capacity (jobs) to increase to fulfill demand. The Project is not a unique use to compel substantial new residents to the area to fulfill the jobs, rather the jobs could be filled by workers already counted within the Los Angeles area. The Project would not conflict with SCAG's projections, the City's projections, or represent any population or housing increase as compared to existing levels. 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. Thus, it does not represent a substantial or significant growth as compared to the existing characteristics. The Project would result in no direct impact to population and housing and a less than significant impact to employee growth.

Localized Growth Forecasts

The following tables provide different geographic scales of population and housing, from the HCP and Citywide. This acknowledges that growth does not occur in a vacuum but in a larger context.

*Table 3.13-3 – Population and Households in the City of Los An*geles lists the 2010 and 2016 population, households, and subsequent persons/housing ratio, the SCAG forecast for 2040.

Table 3.13-4 shows the SCAG's planned growth of the City in population, housing, and employment from 2014 to 2040.[159]

Table 3.13-5 – Population and Households in the Community Plan Area provides data from HCP, adopted in 1988, the more recent 2014 Growth and Infrastructure Report, and the draft HCP Update.

Table 3.13-3
Population and Households in the City of Los Angeles

Year	Population	Households	Persons/Household
2010	3,792,621	1,412,006	2.69
2016	4,030,904	1,453,271	2.77
2040	4,609,400	1,690,300	2.73
Change 2010 to 2016			
Number Changed	+238,283	+41,265	+0.08
Change 2016 to 2040			
Number Changed	+578,496	+237,029	-0.04
2010: Census data, reported 4/1/2010. *2016: As of January 1, 2016, Department of Finance:*			

[158] *Bureau of Labor Statistics: http://www.bls.gov/eag/eag.ca_losangeles_md.htm.*

[159] *The 2014 data was from a May 2015 report and profile. The 2040 projection was from the 2016 RTP adopted April 2016.*

Table 3.13-3
Population and Households in the City of Los Angeles

http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php.
2040: Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf.
Table: CAJA Environmental Services, February 2017.

Table 3.13-4
SCAG Population, Housing and Employment of the City of Los Angeles

	Population	Housing (units)	Employment (jobs)
2014	3,904,657	1,432,553	1,753,559
2040	4,609,400	1,690,300	2,169,100
Change (2014-2040)	+704,743	+257,747	+415,541
2014: SCAG Local Profile for City of Los Angeles, dated May 2015: http://www.scag.ca.gov/Documents/LosAngeles.pdf			
2040: Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf.			
Table: CAJA Environmental Services, February 2017.			

Table 3.13-5
Population and Housing Units in the Hollywood Community Plan Area

Year	Population	Households	Person/Households
2010 Projection	219,000	n/a	n/a
2010 Census	198,228	103,187	1.82
2014 Estimate	207,644	105,212	1.97
2016 Existing	206,000	104,000	1.98
2040 SCAG Forecast	226,000	113,000	2
2040 Proposed Plan	233,000	115,000	2.03
Change 2010 to 2014			
Number Changed	+ 9,416	+ 2,025	+ 0.15
Change 2016 to 2040			
Number Changed	+ 27,000	+ 11,000	+ 0.5

Table 3.13-5
Population and Housing Units in the Hollywood Community Plan Area

Year	Population	Households	Person/Households
2010 Projection from 1988: Hollywood Community Plan, page HO-3: http://cityplanning.lacity.org/complan/pdf/Hwdcptxt.pdf. This has been superseded by 2010 Census data. *2010 Census: Census data, reported 4/1/2010.* *2014: Department of City Planning, Demographics Research Unit, Population/Housing Estimate, July 1, 2014.* *2016, 2040: Based on SCAG estimates and forecast (RTP/SCS 2016-2040). All numbers rounded to the nearest thousand.* *http://planning.lacity.org/cpu/hollywood/text/HwdScopingMtgPacket.pdf* *Table: CAJA Environmental Services, February 2017.*			

The Project would not conflict with SCAG's projections, the City's projections, or represent any population or housing increase. As discussed in the Air Quality and Utilities and Service Systems sections of this IS/MND, the Project is consistent with SCAG's growth projections which are based on macroeconomic data and socioeconomic variables independent of parcel-level land use designation and zoning. The Project would not add housing. The Project is not of the size and scope that it would induce substantial population growth and is not a project of statewide, regional, or area wide significance, according to CEQA Guidelines Section 15206(b). The Project will 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.[160] 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.[161] The Housing Element has identified 2,024 sites (662.1 acres) in the HCP area as having the housing capacity for 24,185 net additional units.[162] The Project Site does not contain housing. The Project

[160] *City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm.*

[161] *City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm.*

[162] *City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.*

would not add housing units and not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.[163]

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.

Original Baseline

Under the Original Baseline, the Project-induced substantial population growth in an area, directly or indirectly, and the operation-related population growth impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project-induced substantial population growth in an area, directly or indirectly, and the operation-related population growth impacts will be less than significant.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The City's threshold is whether a project results in a net loss of housing equal to or greater than one-half block equivalent of habitable housing units through demolition, conversion, or other means. One half block is generally equivalent to 15 single family homes or 25 multi-family dwelling units.

Original Baseline

Under the Original Baseline, the Project would remove four housing units and would not displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere. Therefore, no impacts will occur

Current Baseline

Under the Current Baseline, the Project would not remove any housing units and would not displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere. Therefore, no impact will occur.

[163] *City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.*

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 City's threshold is whether a project results in a net loss of housing equal to or greater than one-half block equivalent of habitable housing units through demolition, conversion, or other means. One half block is generally equivalent to 15 single family homes or 25 multi-family dwelling units.

Original Baseline

Under the Original Baseline, the Project would remove four housing units and does not represent a displacement of substantial number of people, necessitating the construction of replacement housing elsewhere. Therefore, no impact will occur.

Under the Current Baseline, the Project would not remove any housing units and does not represent a displacement of substantial number of people, necessitating the construction of replacement housing elsewhere. Therefore, no impact will occur.

14. PUBLIC SERVICES

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

I-1 School Response, Los Angeles Unified School District, October 11, 2016.

I-2 Parks Response, Los Angeles Department of Recreation and Parks, May 20, 2016.

I-3 Library Response, Los Angeles Public Library, June 29, 2016.

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 Impact. A significant impact may occur if the 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.[164] Pursuant to Table 507.3.3 of the 2014 Fire Code, the maximum response distance between high density residential and commercial land use and a LAFD station that houses an engine company[165] is 1.5 mile and truck company[166] is 2 miles, response distances that if exceeded require the installation of an automatic fire sprinkler system.[167] The Project Site is served by several fire stations, as shown in *Table 3.14-1 – Fire Stations*.

Response Distance

The Project Site is located within the distance identified by the Fire Code. Station No. 27 is within 1.5 miles away and contains Task Forces (truck company and engine company).[168] The Project will be

[164] *http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.*

[165] *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.*

[166] *LAFD: Aerial Ladder Fire Engines: http://lafd.org/about/apparatus.*

[167] *http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.*

[168] *LAFD Task Force: http://lafd.org/apparatus/111-fire-a-rescue-resources/295-lafd-task-force.*

constructed with fire protection as required by the LAFD Chief, unless other building and safety codes supersede this. 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 will be less than significant.

Table 3.14-1
Fire Stations

No.	Address	Distance	Equipment	Staff	Ave. Time (Turnout + Travel)	Incident Counts
27	1327 Cole	1,900 feet	Task Force Ambulance BLS Ambulance Urban Search	14	Non-EMS: 1:02 + 3:24 minutes EMS: 1:09 + 4:07 minutes	Non-EMS: 1,359 EMS: 6,546
41	1439 Gardner	1.5 miles	Engine Ambulance Brush Patrol	6	Non-EMS: 1:07 + 5:24 minutes EMS: 1:05 + 4:39 minutes	Non-EMS: 1,003 EMS: 3,991
82	5769 Hollywood	5,100 feet	Engine Ambulance	6	Non-EMS: 1:08 + 4:25 minutes EMS: 1:09 + 4:01 minutes	Non-EMS: 867 EMS: 3,659

http://lafd.org/fire_stations/find_your_station and http://lafd.org/fsla/stations-map

Incident counts: year 2016 (January to December). Non-EMS is fire emergency. EMS is emergency medical service.

Response Time: year 2016 (January to December) average time (turnout time + travel time) in the station area.

Response time listed above does not include call processing, which averages 1:03 minutes citywide in 2016. 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 EMS unit is dispatched. Turnout Time: The time interval between the activation of station alerting devices to when first responders put on their personal protective equipment and are aboard apparatus and en-route (wheels rolling). Both station alarm and en-route times are required to measure this for each unit that responds.

Travel Time: The time interval that begins when the first unit is en route to the incident and ends upon arrival of any of the units first on scene. This requires one valid en-route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events and unspecified incident locations, may impact travel time.

Incident Count: The number of incidents that result in one or more LAFD units being dispatched, regardless of record qualification.

http://lafd.org/sites/default/files/pdf_files/10-15-2014_AllStations.pdf

http://www.lafd.org/about/apparatus: Typically, a Truck Company runs with a single Engine in a configuration called a "Light Force." Or, when running with two engines, the term "Task Force" is used.

Fire Station Directory, April 2016.

Table: CAJA Environmental Services, February 2017.

Emergency Access

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site (i.e. Sunset Boulevard, Ivar Avenue, Hollywood Boulevard). All circulation would be in compliance with the Fire Code, including any access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts related to emergency access will be less than significant.

Fire Flow

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the zoning of the area, type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing. The fire hydrant locations will be analyzed at the plan check phase.

The fire main and hydrant locations will be analyzed at the plan check phase. The following are regulatory requirements.

The applicant shall consult with the Los Angeles Department of Building and Safety and LAFD to determine fire flow requirements for the Project, and will contact a Water Service Representative at the LADWP to order a Service Advisory Request (SAR/Fire Flow Report). This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the applicant would pay for such upgrades, which would be constructed by either the applicant or LADWP.

The Project shall comply with the required regulations and feasible recommendations of the LAFD relative to fire safety and emergency access, and shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the LAFD prior to the approval of a building permit.

These would ensure that fire protection services are adequate within the proposed buildings and around the Project Site. 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.[169]

Analysis of the Approved Project determined that the Project would potentially have an impact if it were not mitigated. The Adopted MND incorporated Mitigation Measures 14-1 and 14-2, requiring verification of water pressure, and make the necessary upgrades, to existing infrastructure as it relates to fire safety.

[169] *The Approved Project was required to comply with Mitigation Measures 14-1 and 14-2. The mitigation measures which were adopted as part of the Adopted MND are consistent with existing regulations, which projects would be required to comply with at the time of permitting. As the measures are consistent with existing regulations, the mitigation measures would no longer be required as impacts would be less than significant through regulatory compliance.*

Original Baseline

Under the Original Baseline, the Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and the impacts related to fire protection will be less than significant based on compliance with existing regulations.

Current Baseline

Under the Current Baseline, the Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and the impacts related to fire protection will be less than significant based on compliance with existing regulations.

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 LAPD's West Bureau, which oversees LAPD operations in the Hollywood, Olympic, Pacific, West LA, and Wilshire communities.[170] The Hollywood Community Police Station, located at 1358 Wilcox Avenue, is approximately 1,700 feet driving distance from the Project Site. The boundaries of the Hollywood Area are as follows: Mulholland Drive, Griffith Park boundary to the north; Los Angeles City boundary, Melrose Avenue to the south; Normandie Avenue, Griffith Park boundary to the east; and Los Angeles City boundary to the west.[171] Each police station area is divided into smaller Reporting Districts (RD). The Project Site is within RD 646, which has the following boundaries: Hollywood Boulevard to the north; Sunset Boulevard to the south; Highland Avenue to the west; and Vine Street to the east.

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

[170] *LAPD, West Bureau: http://www.lapdonline.org/west_bureau*

[171] *LAPD: http://assets.lapdonline.org/assets/pdf/Hollywood_RD_Mar14.pdf.*

station and the Project Site is often of little relevance to service performance. Instead the realized response time is more directly related to the number of officers deployed. Police assistance is prioritized based on the nature of a call. The average response time to emergency calls for service in the Hollywood Area during 2014 was 5.3 minutes. This response time is below the Citywide average that was 6.2 minutes during 2014 and below the seven minute response time that is a set standard of the LAPD. There are approximately 365 sworn officers and 17 civilian support staff in the Hollywood Area.[172]

Crime Rate

Crime statistics for Part 1 (violent and property) are shown in *Table 3.14-2 – Crimes*. The crime rate, which represents the number of crimes reported, affects the "needs" projection for staff and equipment for the LAPD to some extent.

Table 3.14-2
Crimes

Type of Crime	Hollywood Area	Citywide
Homicide	0	25
Rape	11	102
Robbery	31	755
Aggravated Assault	36	992
Burglary	30	1,171
Motor Vehicle Theft	55	1,562
Burglary Theft from Vehicle	118	2,449
Person/Other Theft	105	2,082
Total Part 1	**386**	**9,138**

Year to date crime rate for week ending January 28, 2017:
http://assets.lapdonline.org/assets/pdf/cityprof.pdf
http://assets.lapdonline.org/assets/pdf/hwdprof.pdf
Table: CAJA Environmental Services, February 2017.

Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site to keep out the curious. The sides along the streets and alley need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services (see **Mitigation**

[172] *LAPD, Community Relations Section.*

Measure MM-Public-1). These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. This measure would reduce potential construction impacts on police protection services to a less than significant level.

Operational Impacts

The Project is seeking a Conditional Use Beverage (CUB) for the on-site sale and dispensing of alcoholic beverages incidental to a proposed 114-guestroom hotel and restaurant. Some CUBs require Standardized Training for Alcohol Retailers (STAR Training). If the Project's CUB requires such training, then all employees involved with the sale of alcoholic beverages shall enroll in the LAPD STAR Training.

The Project Site would have an increase in visitors and patrons, especially over the evening hours due to the hotel 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 feature (see **Mitigation Measure MM-Public-2)**. The Project would create a security plan and include standard security measures such as adequate security lighting, secure key access to hotel rooms, secured onsite parking, and valet parking, and front desk that offers a visual deterrent and human surveillance feature. The Project would provide the LAPD commanding officer of the Hollywood Area a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response (see **Mitigation Measure MM-Public-3**).

The Project (under the Original Baseline and Current Baseline) would not require the construction of a new or expanded police station. There is a large police station one block away. **Mitigation Measures MM-Public-2** and **MM-Public-3** would reduce the impacts associated with police services to a less than significant level.

Mitigation Measures

MM-Public-1 **Public Services (Police – Demolition/Construction Sites)**

Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

MM-Public-2 **Public Services (Police)**

The plans shall incorporate a design that references the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the LAPD. These measures shall be approved by the LAPD prior to the issuance of building permits.

MM-Public-3 Upon completion of the Project, the LAPD 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.

Original Baseline

Under the Original Baseline, mitigation measures would reduce the Project's adverse impacts related to police protection to be less than significant.

Current Baseline

Under the Current Baseline, mitigation measures would reduce the Project's adverse impacts related to police protection to be less than significant

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 LAUSD schools: [173]

- Selma Elementary School (K-5), located at 6611 Selma Avenue. Los Angeles, CA 90028;
- Bancroft Middle School (6-8), located at 929 N. Las Palmas Avenue, Los Angeles, CA 90038; and
- Hollywood High School (9-12), located at 1521 North Highland Avenue, Los Angeles, CA 90028.

Each of the schools' enrollments and capacities are shown in *Table 3.14-3*. There are no anticipated new schools planned for the area.

Table 3.14-3
LAUSD Schools Enrollments and Capacities

Name	Current Capacity [1]	Resident Enrollment [2]	Actual Enrollment [3]	Current Overage/ (Shortage) [4]	Overcrowded Now? [5]	Projected Capacity [6]	Projected Enrollment [7]	Future Overage/ (Shortage) [8]	Overcrowding Future? [9]
Selma Elementary	198	153	156	45	No	178	130	48	No
Bancroft Middle	1,222	729	724	493	No	1,136	737	399	No
Hollywood High	1,432	1,029	1,460	403	No	1,346	905	441	No

[173] *LAUSD: http://rsi.lausd.net/ResidentSchoolIdentifier/.*

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]

Note: Current and projected enrollments/capacities reflect data from School Year (SY) 2015-2016. Current and projected data are updated annually and become available after February 1st of each calendar.

[1] School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet program.

[2] The total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.

-Multi-track calendars are utilized as one method of providing relief to overcrowded schools by increasing enrollment capacities.

-A key goal of the Superintendent and Board of Education is to return all schools to a traditional 2-semester calendar (1 TRK).

[3] The number of students actually attending the school now, including magnet students.

[4] Current seating overage or (shortage): equal to (current capacity) - (resident enrollment).

[5] Current overcrowding status of school or service area. The school or area is currently overcrowded if any of these conditions exist:

-A school is currently on a multi-track calendar.

-There is currently a seating shortage.

-There is currently a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats.

[6] School planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a 2-semester (1 TRK) calendar. Includes capacity allocated to by charter co-locations. Includes capacity for magnet programs.

[7] Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet students.

[8] Projected seating overage or (shortage): equal to (projected capacity) - (projected enrollment).

[9] Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:

-A school remains on a multi-track calendar.

-There is a seating shortage in the future.

-There is a seating overage of LESS THAN or EQUAL TO a 'safety margin' of 30 seats in the future.

Source: School Response, Los Angeles Unified School District, October 11, 2016.

Table by CAJA Environmental Services, February 2017.

As shown on *Table 3.14-4*, the Project (indirectly through its employees) would generate an increase of approximately 14 elementary, 4 middle, and 7 high school students, for a total increase of approximately 25 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD. Selma Elementary School, Bancroft Middle School, and Hollywood High School all have adequate capacity now and in the future to accommodate the Project. Therefore, impacts related to enrollment will be less than significant.

Table 3.14-4
Project Estimated Student Generation

Project		Students Generated			
Source	**Quantity**	**Elementary**	**Middle**	**High**	**Total**
Residential units	0	0	0	0	0
Employees	94	14	4	7	25

Residential land uses: Elementary:0.4 students per household; Middle: 0.1 students per household; High: 0.2 students per household
Commercial and Industrial land uses: 0.2691 students per employee. Note that there is no breakdown by elementary, middle, or high. Therefore the same ratio as residential, 4:1:2, is used.
Source (rates): LAUSD 2012 Developer Fee Justification Study, February 9, 2012.
Table: CAJA Environmental Services, April 2017.

Proximity to Schools

The Project Site is not in close proximity to any schools. The nearest is Selma Elementary School, approximately 700 feet to the west. The school would be generally shielded from the Project Site by intervening residential and commercial buildings on Selma Avenue. 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. Therefore, no impact will 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.

Original Baseline

Under the Original Baseline, the Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and the impacts related to schools will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and the impacts related to schools will be less than significant.

iv) Parks?

No Impact. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts. The LADRP manages all municipally owned and operated recreation and park facilities within the City.

The Adopted MND found no impact due to its strictly commercial uses.

Table 3.14-5 – Parks and Recreation Centers lists the LADRP parks and recreation centers that are located nearby the Project Site. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons). The Project would generate zero residents (directly and indirectly, since as stated above, the types of jobs created would not be unique to induce new population or movement to the area) and approximately 94 employees. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. In addition, the hotel patrons and visitors are also unlikely to frequent parks. The Project would feature the following facilities for hotel patrons: fitness center and pool. Since the Project would not be including any housing or any permanent residents, there would be no required open space elements and no expected use of existing park facilities.

Table 3.14-5
Parks and Recreation Centers

Name	Address	Acres	Features
Pocket Parks (Less than 1 acre and within 0.5 mile of Site)			
Selma Park	6567 Selma Ave.	0.22	Playground, Open Space
Neighborhood Parks (Between 1 and 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
Las Palmas Senior Citizen Center	1820 Las Palmas	1.14	Baseball, basketball, children's play area, handball, indoor gym), tennis courts.

Poinsettia Recreation Center	7341 Willoughby Ave.	6.29	Baseball, basketball, children's play area, handball, indoor gym), tennis courts.
Yucca Community Center	6671 Yucca St.	0.97	Basketball, children's play area, picnic table, soccer
Pan Pacific Park	7600 Beverly Blvd.	32.18	Auditorium, barbecue, baseball, basketball children's play area, indoor gym, picnic tables
Community Parks (Between 10 and 50 acres and within 2 miles of Site)			
Barnsdall Park	4800 Hollywood Blvd	14.59	Basketball, children's play area, picnic table, soccer
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)			
Griffith Park	4730 Crystal Springs Drive	4,281.73	Children's play area, hiking trail, off-leash dog area
Runyon Canyon Park	2000 Fuller Ave.	136.76	Children's play area, hiking trail, off-leash dog area

NavigateLA with Recreation and Parks Department layer: http://navigatela.lacity.org/index01.cfm
Source: Parks Response, Los Angeles Department of Recreation and Parks, May 20, 2016
Table: CAJA Environmental Services, February 2017.

Original Baseline

Under the Original Baseline, the Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and no impacts related to parks will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and no impacts related to parks will be less than significant.

v) Other public facilities?

No Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the Project Site. The LAPL provides library services throughout the City through its Central Library eight 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.[174] On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for community with less than 45,000 population, 14,500 square feet for community with more than 45,000

[174] *LAPL website: http://www.lapl.org/about-lapl/press/2012-library-facts*

population, and up to 20,000 square feet for a Regional Branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.

Table 3.14-6 describes the libraries that would serve the Project. There are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community. The Project would generate zero residents (directly and indirectly, since as state above, the types of jobs created would not be unique to induce new population or movement to the area) and approximately 94 employees. However, employees of commercial developments do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours. In addition, the hotel patrons and visitors are also unlikely to frequent the library. Since the Project would not be including any housing or any permanent residents, they would not be expected use to existing library facilities.

Table 3.14-6
Los Angeles Public Libraries

Name	Address	Size (sf)	Volumes/Circulation	Current Service	Staff
Goldwyn Hollywood Branch	1623 Ivar Ave.	19,000	87,182 / 123,539	78,944	10
Durant Branch	7140 Sunset Blvd.	12,500	47,727 / 138,968	25,657	8
Fremont Branch	6121 Melrose Ave.	7,361	40,452 / 99,181	30,896	6.5
Wilshire Branch	149 N. St Andrews	6,258	33,988 / 107,838	50,715	6.5
Cahuenga Branch	4591 Santa Monica	10,942	40,733 / 116,099	48,435	6.5
Los Feliz Branch	1874 Hillhurst Ave.	10,449	50,220 / 185,658	44,639	7.5
Fairfax Branch	161 S. Gardner St.	12,500	52,262 / 209,707	48,435	8

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.
Table: CAJA Environmental Services, April 2017.

Original Baseline

Under the Original Baseline, the Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and the impacts related to other public facilities will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not result in substantial and adverse physical impacts associated with new or physically altered governmental facilities, and the impacts related to other public facilities will be less than significant.

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?

No Impact. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities. The Project would generate zero residents and approximately 94 employees. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. In addition, the hotel patrons and visitors are also unlikely to frequent parks. The Project would feature the following facilities for hotel patrons: fitness center and pool. There would be no increased residents, which could lead to physical deterioration of facilities or accelerate deterioration.

The Adopted MND found no impact due to its strictly commercial uses.

Original Baseline

Under the Original Baseline, the Project would not 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, and no impact will occur.

Current Baseline

Under the Current Baseline, the Project would not 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, and no impact will occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The Project would generate zero residents and approximately 94 employees. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. In addition, the hotel patrons and visitors are also unlikely to frequent parks. The Project would feature the following facilities for hotel patrons: fitness center and pool. There would be no increased residents, which could require the construction or expansion of recreation facilities.

The Adopted MND found no impact due to its strictly commercial uses.

Original Baseline

Under the Original Baseline, the Project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and no impacts will occur.

Current Baseline

Under the Current Baseline, the Project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and no impact will occur.

16. TRANSPORTATION AND TRAFFIC

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

J-1 Traffic Impact Analysis, Overland Traffic Consultants, Inc., May 2017.

J-2 LADOT Approval Letter, June 11, 2017.

J-3 Partial Off-Site Parking and Valet Service Evaluation, Overland Traffic Consultants, Inc., November 2017.

J-4 LADOT Approval Letter, December 6, 2017.

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if roadways and intersections that would carry project-generated traffic would exceed adopted LADOT thresholds of significance.

Study Scope

The Traffic Impact Analysis has been conducted using the procedures adopted by LADOT to analyze the potential traffic impacts of new development projects. The intersections were evaluated using the LADOT Critical Movement Analysis (CMA) methodology. The CMA methodology calculates the operating conditions of each individual study intersection using a ratio of peak hour traffic volume to the intersection's capacity. Any change to the intersection's peak hour operating condition caused by an increase/decrease in traffic volume can be quantified (i.e., traffic impact) using this analysis methodology. Potential traffic impacts caused by a project that exceeds limits established by the City, as specified by LADOT, are identified. Any potentially significantly impacted intersections are then evaluated for possible traffic mitigation measures. Pursuant to the City traffic impact guidelines, the following steps have been taken to develop the existing and future traffic volume estimate:

(a) Traffic counts were conducted on May 28, 2015 for four intersections and conducted on May 12, 2016 for the remaining 6 study intersections. These counts were increased by one percent per year to account for potential growth in the area to year 2017;

(b) Traffic in (a) + the net Project traffic (existing + Project);

(c) Traffic in (b) + proposed traffic mitigation, if necessary;

(d) Existing + ambient growth to 2020 (added additional one percent 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); and

(g) Traffic in (f) + the proposed traffic mitigation, if necessary.

Two baseline (Existing 2017) traffic conditions are evaluated in this study. The original baseline has been included to represent the site prior to the restaurant and retail space construction. This baseline includes 4 residential units, 4,893 square feet of vacant retail, 3,174 square feet of restaurant and 1,650 square feet of piano bar. The trips produced by these land uses have been added to the existing traffic data to present the Original Baseline. The Current Baseline has been included to represent the approved 20,624 square foot restaurant and 6,000 square feet of retail. The trips produced by these land uses have been added to the existing traffic data to present the Current Baseline.

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 10 key intersections. The intersections are under the City's jurisdiction. It should be noted that future traffic conditions include the potential construction of 136 other land development projects (related projects) in the general vicinity of the Project Site. (Figure 3, Intersection Characteristic, included in the Traffic Impact Analysis, as Appendix J-1 to this IS/MND, 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. Hollywood Boulevard and Wilcox Avenue,
2. Cahuenga Boulevard and Hollywood Boulevard;
3. Highland Avenue and Selma Avenue;
4. Selma Avenue and Wilcox Avenue;
5. Cahuenga Boulevard and Selma Avenue;
6. Highland Avenue and Sunset Boulevard
7. Sunset Boulevard and Wilcox Avenue;
8. Cahuenga Boulevard and Sunset Boulevard;
9. Vine Street and Hollywood Boulevard; and

10. Vine Street and Sunset Boulevard.

Existing Transportation Facilities Setting

The Mobility 2035 Plan was approved by the City Planning Commission and adopted by City Council during 2015. The Mobility 2035 Plan dictates the street standards and designations within the plan area. The Project will be subject to the Mobility 2035 Plan.

The Project is in the HCP area of the City, which is serviced by the Hollywood Freeway (US-101), a regional north-south freeway to the east of the Project. This freeway links to numerous other freeways in the vicinity providing extensive regional access. The Hollywood Freeway is accessible via Hollywood Boulevard, Sunset Boulevard, Cahuenga Boulevard, Gower Street and Highland Avenue. The freeway is approximately one mile west of the Project Site and approximately ¾ mile north of the Project Site. The Hollywood Freeway carries approximately 213,000 vehicles per day (VPD) with 12,800 vehicles per hour (VPH) during peak periods.

Cahuenga Boulevard is a north-south roadway designated as a Avenue I north of Franklin Avenue, as a Modified Avenue I south of Franklin Avenue, and as a Modified Avenue II south of Yucca Street by the Mobility 2035 Plan. Cahuenga Boulevard provides two lanes in each direction and a bike lane in the Project Site area. Left turns from north and southbound Cahuenga Boulevard to Hollywood Boulevard are prohibited during the evening peak hours.

Highland Avenue is a north-south roadway designated as an Avenue I between Cahuenga Boulevard and Melrose Avenue by the Mobility 2035 Plan. Three lanes in each direction are provided in the Project Site area during peak hours. Left turn lanes are provided at major intersections.

Hollywood Boulevard is an east-west roadway designated as an Avenue I by the Mobility 2035 Plan. Two lanes in each direction are provided in the Project Site area.

Selma Avenue is an east-west roadway designated as a Local Street by the City. One lane in each direction is provided in the Project Site area. Two-hour time limited parking is provided in the Project Site area. Short-term metered parking is provided west of Wilcox Avenue around the existing United States Post Office.

Sunset Boulevard is an east-west roadway designated as an Avenue I in the Mobility 2035 Plan. Sunset Boulevard provides three lanes in each direction at Highland Avenue and Wilcox Avenue but reduces down to two lanes in each direction at Cahuenga Boulevard. One-hour time limited metered parking is provided during off-peak hours in the Highland Avenue and Wilcox Avenue area on Sunset Boulevard.

Vine Street is a north-south roadway designated as an Avenue II in the City of Los Angeles Mobility Plan 2035. Two lanes in each direction are provided in the Modified Project area. The roadway extends from the Hollywood Freeway at Franklin Avenue to Melrose Avenue where it changes name to Rossmore Avenue.

Wilcox Avenue is a north-south roadway designated as a Modified Avenue III in the Project vicinity by the Mobility 2035 Plan. One lane in each direction with left turn lanes at some intersections are provided in the Project Site area. One-hour time limited metered parking is available in the Project Site area.

Project Traffic Generation

Traffic-generating characteristics of many land uses including the existing office and the proposed hotel, has been surveyed by the 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 hotel, restaurant and bar use generally exhibit the trip-making characteristics as shown by the trip rates in *Table 3.16-1 – Traffic Generation Rates*.

Table 3.16-1
Traffic Generation Rates

ITE Code	Description	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
310	Hotel	8.17	0.53	59%	41%	0.60	51%	49%
220	Apartment	6.65	0.51	20%	80%	0.62	65%	35%
820	Retail	42.7	0.96	62%	38%	3.71	48%	52%
931	Quality Restaurant	89.95	0.81	55%	45%	7.49	67%	33%
925	Drinking Place	56.7	N/a			11.34	66%	34%
932	High Turnover Restaurant	127.15	10.81	55%	45%	9.85	60%	40%

Rates are per hotel room or 1,000 sf.
Table 1 in Traffic Impact Study, Overland Traffic Consultants, May 2017.
Table: CAJA Environmental Services, May 2017.

The rooftop area of the hotel provides a hotel pool and congregating areas that are exclusive to the guests of the hotel. There are also rooftop areas that include bar services that are open to the public. The trip generation is higher for a restaurant during the daily and AM Peak Hour but higher for the bar (drinking place) for the PM Peak Hour. In order to present a conservative estimate of potential Project traffic impacts, the higher restaurant rates were used for the daily and AM Peak Hour and the higher bar rates were used during PM Peak Hour.

The ITE rates are estimated without regard for the nature of the Project's vicinity in terms of transit and walking or interaction with the traffic on the surrounding roadways. Considering the multiple transit opportunities, walkability and expanding cycling infrastructure in the city, it is anticipated that employees and guests will make use of these options to single occupant vehicles. However, no reductions for this aspect have been incorporated into the analysis, and therefore this analysis presents a conservative impact analysis.

The hotel will provide a rooftop bar and a separate ground floor restaurant that will be open to the public. It is expected that many of the patrons of both of the venues in the hotel will be used by the hotel guests who are already on the site and will not create a new vehicle trip to patronize them. Based on the anticipated operations of the hotel, 50% internal trip credit was applied and approved by LADOT for the restaurants and bar.

Many land uses are visited on the way to or from another main destination point. The greater the regional draw the lower the pass-by activities. LADOT has established passby credits for several land uses. A 10% pass-by reduction has been incorporated into the analysis for the proposed rooftop restaurant/bar and a 20% pass-by reduction has been incorporated into the analysis for the ground floor restaurant as approved by LADOT. These reductions are not taken at the nearby intersections of Selma Avenue and Wilcox Avenue because patrons may need to make turning movements at these intersections to access the site.

It is estimated that the Project will conservatively generate a potential increase of 1,227 daily trips with 70 trips during the morning peak hour and 100 trips during the evening peak hour after internal and pass-by trips credits. *Table 3.16-2* displays the estimated Project trip generation.

Table 3.16-2
Estimated Project Traffic Generation

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Proposed								
Hotel	114 rooms	931	60	36	24	68	35	33
Restaurant	1,809 sf	230	20	11	9	18	11	7
Internal Trips	50%	(115)	(10)	(5)	(5)	(9)	(5)	(4)
Pass-by	20%	(23)	(2)	(1)	(1)	(2)	(1)	(1)
Subtotal		92	8	5	3	7	5	2
Rooftop Bar	5,041 sf	453	4	3	1	57	37	20
Internal Trips	50%	(227)	(2)	(1)	(1)	(29)	(19)	(10)
Pass-by	10%	(23)	(0)	0	0	(3)	(2)	(1)
Subtotal		204	2	2	0	26	17	9
Net Total		**1,227**	**70**	**43**	**27**	**100**	**56**	**44**

The traffic study restaurant and bar spaces are the spaces that are outside the ancillary space for the hotel and separate trip-generating square footage.
Table 2 in Traffic Impact Study, Overland Traffic Consultants, May 2017.
Table: CAJA Environmental Services, May 2017.

Trip Distribution and Assignment of Project Traffic

A primary factor affecting a Project's trip direction is the locations of the potential origin and destination points that would generate Project trips. This is where the employees and guests of the hotel and restaurants are coming from and going to. The estimated Project directional trip distribution is also based

on the study area roadway network, freeway locations, traffic flow patterns in and out of this area of the City and consistency with previously approved traffic studies for this area of the City.

Figure 4, Overall Project Distribution Percentage, included in the Traffic Impact Analysis, as Appendix J-1 to this MND, illustrates the estimated areawide Project traffic distribution percentages. Figure 5, Project Distribution Percentages, included in the Traffic Impact Analysis, as Appendix J-1 to this MND, shows the estimated Project traffic percentages detailed at each of the selected study intersections. Using the traffic assignment at each intersection and the estimated peak hour traffic volume as provided in the *Table 3.16-2*, peak hour traffic volumes at each study location have been calculated and are shown in Figure 6 for the development (included in the Traffic Impact Analysis, as Appendix J-1 to this MND). This estimated assignment of the Project traffic flow provides the information necessary to analyze the potential traffic impacts generated by the Project at the study intersections.

Analysis of Existing Traffic Conditions

Traffic volume data used in the following peak hour intersectional analysis were based on traffic counts conducted by National Data Systems, an independent traffic data collection company. Traffic counts were conducted on Thursday, May 28, 2015 at four of the study intersections and on Thursday, May 12, 2016 on the remaining six study intersections. These counts were increased by 1% per year to account for potential traffic growth in the area from the day the data was collected to current year 2017.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.

In order to evaluate the proposed hotel's potential traffic impact two baseline scenarios have been incorporated. The "Original Baseline" includes the land uses that were in place prior to the construction of the garage, retail and restaurant. This included four residential units, 4,893 square feet of vacant retail, 3,174 square feet of restaurant and a 1,650-square foot piano bar. The second baseline scenario "Current Baseline" incudes the permitted 20,624 square foot TAO Restaurant and 6,000 square feet of retail. The trip generation for both land uses were added to the base 2017 existing conditions. *Table 3.16-3 - Trip Generation Original Baseline* displays the trip generation for the Original Baseline and *Table 3.16-4 - Trip Generation Current Baseline,* displays the trip generation for the Current Baseline.

The vehicle trip distribution for these two baselines was conducted the same as the prior entitlements for the approved restaurant and retail. Figure 7a and 7b, included in the Traffic Impact Analysis, as Appendix J-1 to this MND, provides a display of the trips added to the existing 2017 counts for both scenarios. Figure 8a and 8b, included in the Traffic Impact Analysis, as Appendix J-1 to this MND, provides AM and PM peak hours respectively trips with the Existing 2017 counts with the Original Baseline trip added and Figure 9a and 9b, included in the Traffic Impact Analysis, as Appendix J-1 to this MND, provides the AM and PM peak hours' trips with the Existing 2017 counts with the Current Baseline trips added.

Table 3.16-3
Trip Generation Original Baseline

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Original Baseline								
Residential	4 units	27	2	0	2	2	2	0
Retail (vacant)	4,893 sf	0	0	0	0	0	0	0
Restaurant	3,174 sf	286	3	2	1	24	16	8
Pass-by	10%	(29)	0	0	0	(2)	(1)	(1)
Subtotal		257	3	2	1	22	15	7
Piano Bar	1,650 sf	94	0	0	0	19	12	7
Pass-by	10%	(9)	0	0	0	(2)	(1)	(1)
Subtotal		85	0	0	0	17	11	6
Net Original Baseline		**368**	**5**	**2**	**3**	**41**	**28**	**13**

Table 3a in Traffic Impact Study, Overland Traffic Consultants, May 2017.
Table: CAJA Environmental Services, May 2017.

Table 3.16-4
Trip Generation Current Baseline

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			Total	In	Out	Total	In	Out
Current Baseline								
Restaurant	20,624 sf	1,855	17	9	8	154	103	52
Pass-by	10%	(186)	(2)	(1)	(1)	(15)	(10)	(5)
Subtotal		1,669	15	8	7	139	93	47
Retail	6,000 sf	256	6	4	2	22	11	11
Net Original Baseline		**1,925**	**21**	**12**	**9**	**161**	**104**	**57**

Table 3b in Traffic Impact Study, Overland Traffic Consultants, May 2017.
Table: CAJA Environmental Services, May 2017.

The traffic conditions analysis was conducted using the Critical Movement Analysis (CMA) methodology. The study intersections were evaluated using this methodology pursuant to the criteria established by the City of Los Angeles Department of Transportation for signalized intersections. The existing peak hour traffic counts (Original and Current Baseline) were used along with intersection lane configurations and traffic controls to determine the intersection's current operating condition. The CMA procedure uses a ratio of the intersection's traffic volume to its capacity for rating an intersections congestion level. The highest combinations of conflicting traffic volume (V) at an intersection are divided by the intersection capacity value. Intersection capacity (C) represents the maximum volume of vehicles

that have a reasonable expectation of passing through an intersection in one hour under typical traffic flow conditions.

The CMA procedure uses a ratio of the traffic volume to the capacity of an intersection. This volume-to-capacity (V/C) ratio defines the proportion of an hour necessary to accommodate all the traffic moving through the intersection assuming full capacity. V/C ratios provide an ideal means for quantifying intersection operating characteristics. For example, if an intersection has a V/C value of 0.70, the intersection is operating at 70% capacity with 30% unused capacity. Once the volume-to-capacity ratio has been calculated, operating characteristics are assigned a level of service grade (A through F) to estimate the level of congestion and stability of the traffic flow. The term "Level of Service" (LOS) is used by traffic engineers to describe the quality of traffic flow. Definitions of the LOS grades are shown in *Table 3.16-3 – Level of Service Definitions*.

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, May 2017.
Table by CAJA Environmental Services, May 2017.

Reductions for traffic signal improvements in the area are included in the analysis. The area currently has Automated Traffic Surveillance and Control (ATSAC) systems improvements which increase capacity at the intersection through computer aided signal progression. The City of Los Angeles has determined that this type of improvement increases capacity by approximately 7%. The City has supplemented the signal systems in the Project area of Hollywood with an upgrade to the ATSAC system, which includes advance

loop detection at the intersections and system wide progression computer programming with system wide interaction between the traffic signals. This system is known as the Adaptive Traffic Control System (ATCS) system. An additional 3% capacity increase is estimated with this signal system. The existing and future traffic conditions analysis with and without the Project include ATSAC and ATCS because both signal systems are installed at all the study intersections.

Five of the eight study intersections had high pedestrian volumes during one or both peak periods. These intersections included: Highland Avenue and Sunset Boulevard during the PM Peak Hour, Hollywood Boulevard and Wilcox Avenue during the PM Peak Hour, Sunset Boulevard and Wilcox Avenue during the PM Peak Hour, Cahuenga Boulevard and Hollywood Boulevard during the AM and PM Peak Hour, Cahuenga Boulevard and Sunset Boulevard during the AM and PM Peak Hour, Vine Street and Hollywood Boulevard during the PM Peak Hour, and Vine Street and Sunset Boulevard during the AM and PM Peak Hour. The intersection capacity was reduced by 3% to account for this activity.

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 are summarized in Table 3.16-5 with the Original Baseline traffic volumes and Table 3.16-6 with the Current Baseline traffic volumes.

Analysis of Existing + Project Conditions

An evaluation has been conducted to evaluate potential Project impacts to the existing conditions. According to the standards adopted by LADOT and described in their August 2014 Traffic Study Policies and Procedures, a traffic impact is considered significant if the related increase in the V/C value equals or exceeds the thresholds shown in the *Table 3.16-4 - Significant Impact Criteria, City of Los Angeles*. The potential impact for existing plus Project was conducted by adding the Project traffic to the existing traffic. The existing and existing + Project traffic conditions were compared to determine if the thresholds of significance in *Table 3.16-4* were exceeded. As noted in *Table 3.16-5 – CMA Summary (Original Baseline)* and *Table 3.16-6 – CMA Summary (Current Baseline)* (located later in this section), no significant impacts occur when the Project's traffic generation is added to the existing conditions with Original and Current baselines.

Table 3.16-4
Significant Impact Criteria, City of Los Angeles

LOS	Final V/C Value	Increase in V/C Value
C	0.701 – 0.800	+ 0.040
D	0.801 – 0.900	+ 0.020
E and F	> 0.901	+ 0.010 or more

No significant impacts occur at LOS A or B because intersections operations are good and can accommodate additional traffic growth.
Source: Table 6, Traffic Impact Study, Overland Traffic, May 2017.
Table by CAJA Environmental Services, May 2017.

Analysis of Future Traffic Conditions

Future traffic volume projections have been developed to analyze the traffic conditions after completion of other planned land developments including the proposed Project. Pursuant to the City's traffic impact guidelines, the following steps have been taken to develop the future traffic volume estimate:

(a) Existing 2017 traffic conditions with original Baseline and with Current Baseline volumes;

(b) Traffic in (a) + ambient growth (one percent per year increase) to year 2020;

(c) Traffic in (b) + related Projects (without Project scenario);

(d) Traffic in (c) with the proposed Project traffic (with Project scenario); and

(e) Traffic in (d) + the proposed traffic mitigation, if necessary.

The future cumulative analysis includes other development Projects located within the study area that are either under construction or brought to the attention of the City as planned for future development. As part of this analysis, the related Project information was obtained from the LADOT and City's Department of City Planning[175]. 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 10 (included in the Traffic Impact Analysis, as Appendix J-1 to this MND) and shown in Table 9 (included in the Traffic Impact Analysis, as Appendix J-1 to this MND). The number of trips added to the area by the related projects alone is displayed in Figure 11 (included in the Traffic Impact Analysis, as Appendix J-1 to this MND).

To evaluate future traffic conditions with the related project, estimates of the peak hour trips generated were developed. The potential traffic growth in the future at the study intersections has been determined by adding the existing traffic volume, ambient traffic growth of one percent per year and traffic from the other related development projects. This is a conservative analysis because CEQA Guidelines Section 15130 requires a list or growth percentage and the analysis is doing both. Future cumulative "without project" using Original Baseline estimates are shown in Figure 12a for the AM Peak Hour and Figure 12b for the PM Peak Hour (figures included in the Traffic Impact Analysis, as Appendix J-1 to this MND). Future cumulative "without project" using Current Baseline estimates are shown in Figure 13a for the AM Peak Hour and Figure 13b for the PM Peak Hour (figures included in the Traffic Impact Analysis, as Appendix J-1 to this MND).

The traffic conditions created by the ambient traffic growth plus the other related development projects are shown in *Table 3.16-5 – CMA Summary (Original Baseline)* and *Table 3.16-6 – CMA Summary (Current Baseline)* (later in this section). Comparing the changes in the traffic conditions between the future without Project and future with Project provides the necessary information to determine if the

[175] *From LADOT Case Files and Planning Website, Updated March 2016.*

Project's projected traffic increases have the potential to create a significant impact on any of the study intersections.

Project Impacts

Construction

Construction worker vehicles would park in the existing parking lots around the Project Site and on-site. Temporary impacts to pedestrian safety could occur during construction, especially on Selma Avenue. The Project will comply with **Mitigation Measure MM-Traffic-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. 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 Selma Avenue, between Cahuenga and Wilcox. This would not go near Selma Avenue Elementary. The general haul route is described in Section 2, Project Description, of this MND.

Operation

Traffic conditions after completion of the Project have been calculated by adding the Project volume to the future without Project traffic volume with Original Baseline and to the future without Project traffic volume with the Current Baseline.

The traffic impact of the added Project traffic at the study intersections is shown Table 3.16-5 by the comparison of the (Future without Project with Original Baseline) and the (Future using the Original Baseline + Project) traffic conditions at the study intersections. The significant impact criteria were applied to the future traffic conditions. As shown in Table 3.16-5, one significant traffic impacts during the PM Peak Hour. This significant impact occurs at Hollywood Boulevard and Wilcox Avenue. Traffic reduction measures are proposed to mitigate this impact to a level of less than significance.

The traffic impact of the added Project traffic at the study intersections is shown in Table 3.16-6 by the comparison of the (Future without Project with Current Baseline) and the (Future using the Current Baseline + Project) traffic conditions at the study intersections. The significant impact criteria were applied to the future traffic conditions. As shown in Table 3.16-6, two significant traffic impacts during the PM Peak Hour. The significant impacts occur at Hollywood Boulevard and Wilcox Avenue and at Selma Avenue and Wilcox Avenue. Traffic reduction measures are proposed to mitigate this impact to a level of less than significance.

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 using the Original Baseline" peak hour traffic volumes are shown in Figure 14a for the AM Peak Hour and Figure 14b for the PM Peak Hour. Future cumulative "With Project using the Current Baseline" peak hour traffic

volumes are shown in Figure 15a for the AM Peak Hour and Figure 15b for the PM Peak Hour (figures included in the Traffic Impact Analysis, as Appendix J-1 to this MND).

Table 3.16-5
CMA Summary (Original Baseline)

No.	Intersection	Peak Hour	Existing		Existing + Project				Future (2020) No Project			Future (2020) + Project			Significant
			CMA	LOS	CMA	LOS	Impact	Significant	CMA	LOS	Growth	CMA	LOS	Impact	
1	Hollywood and Wilcox	AM	0.477	A	0.485	A	+ 0.008	No	0.760	C	+ 0.283	0.767	C	+ 0.007	No
		PM	0.424	A	0.434	A	+ 0.010	No	0.839	D	+ 0.415	0.849	D	+ 0.010	No
2	Cahuenga and Hollywood	AM	0.880	D	0.881	D	+ 0.001	No	1.014	F	+ 0.134	1.016	F	+ 0.002	No
		PM	0.756	C	0.758	C	+ 0.002	No	0.955	E	+ 0.199	0.957	E	+ 0.002	No
3	Highland and Selma	AM	0.744	C	0.749	C	+ 0.005	No	0.947	E	+ 0.203	0.952	E	+ 0.005	No
		PM	0.565	A	0.574	A	+ 0.009	No	0.903	E	+ 0.338	0.913	E	+ 0.010	**YES**
4	Selma and Wilcox	AM	0.297	A	0.308	A	+ 0.011	No	0.507	A	+ 0.210	0.519	A	+ 0.012	No
		PM	0.382	A	0.413	A	+ 0.031	No	0.729	C	+ 0.347	0.761	C	+ 0.032	No
5	Cahuenga and Selma	AM	0.547	A	0.555	A	+ 0.008	No	0.653	B	+ 0.106	0.661	B	+ 0.008	No
		PM	0.579	A	0.581	A	+ 0.002	No	0.770	C	+ 0.191	0.772	C	+ 0.002	No
6	Highland and Sunset	AM	0.881	D	0.885	D	+ 0.004	No	1.100	F	+ 0.219	1.104	F	+ 0.004	No
		PM	0.661	B	0.665	B	+ 0.004	No	0.877	D	+ 0.216	0.881	D	+ 0.004	No
7	Sunset and Wilcox	AM	0.411	A	0.415	A	+ 0.004	No	0.641	B	+ 0.230	0.645	B	+ 0.004	No
		PM	0.421	A	0.429	A	+ 0.008	No	0.649	B	+ 0.228	0.663	B	+ 0.014	No
8	Cahuenga and Sunset	AM	0.820	D	0.824	D	+ 0.004	No	0.990	E	+ 0.170	0.995	E	+ 0.005	No
		PM	0.730	C	0.735	C	+ 0.005	No	0.930	E	+ 0.200	0.935	E	+ 0.005	No
9	Hollywood and Vine	AM	0.776	C	0.779	C	+ 0.003	No	0.933	E	+ 0.157	0.935	E	+ 0.002	No
		PM	0.743	C	0.745	C	+ 0.002	No	0.943	E	+ 0.200	0.945	E	+ 0.002	No
10	Sunset and Vine	AM	0.827	D	0.829	D	+ 0.002	No	1.003	F	+ 0.176	1.006	F	+ 0.003	No
		PM	0.874	D	0.875	D	+ 0.001	No	1.081	F	+ 0.207	1.082	F	+ 0.001	No

Source: Tables 5a, 7a, 8a, 9a, and 10a, Traffic Impact Study, Overland Traffic, May 2017.
Table by CAJA Environmental Services, May 2017.

Table 3.16-6
CMA Summary (Current Baseline)

No.	Intersection	Peak Hour	Existing		Existing + Project				Future (2020) No Project			Future (2020) + Project			Significant
			CMA	LOS	CMA	LOS	Impact	Significant	CMA	LOS	Growth	CMA	LOS	Impact	
1	Hollywood and Wilcox	AM	0.479	A	0.486	A	+ 0.007	No	0.761	C	+ 0.282	0.768	C	+ 0.007	No
		PM	0.432	A	0.442	A	+ 0.010	No	0.847	D	+ 0.415	0.857	D	+ 0.010	No
2	Cahuenga and Hollywood	AM	0.881	D	0.882	D	+ 0.001	No	1.015	F	+ 0.134	1.016	F	+ 0.001	No
		PM	0.758	C	0.760	C	+ 0.002	No	0.958	E	+ 0.200	0.958	E	+ 0.000	No
3	Highland and Selma	AM	0.745	C	0.750	C	+ 0.005	No	0.949	E	+ 0.204	0.954	E	+ 0.004	No
		PM	0.582	A	0.591	A	+ 0.009	No	0.921	E	+ 0.339	0.931	E	+ 0.010	**YES**
4	Selma and Wilcox	AM	0.299	A	0.031	A	- 0.268	No	0.511	A	+ 0.212	0.522	A	+ 0.011	No
		PM	0.423	A	0.455	A	+ 0.032	No	0.771	C	+ 0.348	0.803	D	+ 0.032	**YES**
5	Cahuenga and Selma	AM	0.549	A	0.557	A	+ 0.008	No	0.655	B	+ 0.106	0.663	B	+ 0.008	No
		PM	0.581	A	0.583	A	+ 0.002	No	0.773	C	+ 0.192	0.775	C	+ 0.002	No
6	Highland and Sunset	AM	0.882	D	0.886	D	+ 0.004	No	1.101	F	+ 0.219	1.105	F	+ 0.004	No
		PM	0.669	B	0.673	B	+ 0.004	No	0.885	D	+ 0.216	0.889	D	+ 0.004	No
7	Sunset and Wilcox	AM	0.413	A	0.417	A	+ 0.004	No	0.643	B	+ 0.230	0.647	B	+ 0.004	No
		PM	0.433	A	0.440	A	+ 0.007	No	0.662	B	+ 0.229	0.676	B	+ 0.014	No
8	Cahuenga and Sunset	AM	0.821	D	0.825	D	+ 0.004	No	0.992	E	+ 0.171	0.995	E	+ 0.003	No
		PM	0.736	C	0.741	C	+ 0.005	No	0.936	E	+ 0.200	0.941	E	+ 0.005	No
9	Hollywood and Vine	AM	0.777	C	0.779	C	+ 0.002	No	0.933	E	+ 0.156	0.935	E	+ 0.002	No
		PM	0.745	C	0.747	C	+ 0.002	No	0.945	E	+ 0.200	0.948	E	+ 0.003	No
10	Sunset and Vine	AM	0.827	D	0.830	D	+ 0.003	No	1.004	F	+ 0.177	1.006	F	+ 0.002	No
		PM	0.875	D	0.877	D	+ 0.002	No	1.083	F	+ 0.208	1.084	F	+ 0.001	No

Source: Tables 5b, 6b, 7b, 9b, and 10b, Traffic Impact Study, Overland Traffic, May 2017.
Table by CAJA Environmental Services, May 2017.

Traffic Impact Study Conclusion

Construction impacts would be reduced to less than significant levels with **Mitigation Measure MM-Traffic-1.** The mitigation measure would require that a Construction Traffic Control/Management Plan be submitted to the Department of Transportation for review and approval prior to the start of construction. The Plan would include information regarding compliance with existing regulations as it pertains to temporary street closures and pedestrian safety measures, as required and approved by the Bureau of Street Services and the Department of Building and Safety.

The Project will significantly impact the traffic flow at one of the study intersections under the Original Baseline during the PM Peak Hour and two intersections under the Current Baseline during the PM Peak Hour. These impacts can be reduced to a level of less than significance with implementation of a TDM plan with a 10% effectiveness of reducing vehicle trips during the peak periods. The goal of the TDM plan would be to encourage guests and employees to use alternatives to single occupant vehicles to reduce overall traffic in the area. See **MM-Traffic-2**.

The Project will also comply with all the applicable regulatory requirements of the LADOT approval letter, and as it may be subsequently amended or modified.

The LADOT concurred with the supplemental traffic assessment on December 6, 2017 (Appendix J-4 of this MND).

Mitigation Measures

MM-Traffic-1 **Construction Traffic Control/Management Plan.** A construction work site traffic control plan shall be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction-related traffic shall be restricted to off-peak hours.

MM-Traffic-2 **Transportation Demand Management and Monitoring Program.**

- The Applicant shall prepare and submit a preliminary Transportation Demand Management Plan (TDM) to the Department of Transportation prior to the issuance of the first building permit for the Project. A final TDM shall be submitted and approved by the Department of Transportation prior to the issuance of the first certificate of occupancy for the project.

  The TDM shall include strategies, as determined to be appropriate by the Department of Transportation, which would have a minimum ten (10) percent effectiveness in reducing new vehicle trips.

In the event that the Project would provide twenty (20) or more required parking spaces off-site, the TDM shall demonstrate a minimum twenty (20) percent effectiveness in reducing new vehicle trips.

- In the event that the Project would provide twenty (20) or more parking spaces off-site and is required to implement a TDM which has a minimum twenty (20) percent effectiveness in reducing the total net project trips, a Monitoring Program (MP) shall be prepared to provide continued monitoring of the TDP's effectiveness. The MP shall be prepared by a licensed Traffic Engineer and submitted to the Department of Transportation for review. The MP shall continue until such time that the Project has shown, for three consecutive years, at a minimum of 85 percent occupancy, achievement of the peak hour trip volume requirements listed. Should the review show that the peak hour trip cap threshold has been exceeded the Project shall have one year to attain compliance or be subject to a penalty program.

  Implementation of the TDM shall be at the Project's expense.

  Strategies may include, but shall not be limited to, the following:

  1. Provide guest assistance on arrival and departure to find options to personal or rented vehicles to access the site.

  2. If found feasible by LADOT and Metro, improve the existing bus stop on the north side of Hollywood Boulevard east of Wilcox Avenue where there is an existing sign, bench and trash receptacle with a weather protected cover. Improve the bus stop on the south side of Hollywood Boulevard west of Cahuenga Boulevard where a bus sign only with a bench, trash receptacle, weather protected cover and bench. Improve the bus stop on the north side of Sunset Boulevard west of Wilcox Avenue where a bus sign, a bench, and trash receptacle with a weather protected cover;

  3. Provide a visible on-site kiosk with options for ridesharing, bus routes and bike routes in a prominent area(s) in view for hotel guests, employees and patrons of the restaurants;

  4. Provide information for guests of the hotel upon check in that includes the transit, bike routes, and nearby walking opportunities as options to use rather than person vehicles;

  5. Provide an on-site TDM manager to assist hotel guests navigate the alternative modes of transportation options, in matching rideshare partners

for the employees, determining transit routes for employees, and promoting TDM program;

6. Provide access pass and transit pass reductions for employees;

7. Provide bicycle spaces to encourage cycling as an alternative to single occupant vehicles;

8. Provide bicycle sharing service for guests and employees use;

9. Provide amenities to encourage guests of the hotel spend some of their time eating, relaxing and recreating on-site.

Impacts After Mitigation

A full Transportation Management Plan will be developed that will detail project traffic reduction measures for the hotel and restaurant guests and employees of the project. The project amenities are anticipated to reduce the number of vehicles to and from the project site. A minimum of 10% reduction in new Project vehicle trips has been estimated to account for trip reduction measures. Implementation of the TDM plan with 10% effectiveness will reduce the significant impact to a level of less than significance. Table 13.16-7 displays the results of the analysis under the Original Baseline and 3.16-8 under the Current Baseline.

Table 3.16-7
CMA Summary With Mitigation (Original Baseline)

No.	Intersection	Peak Hour	Future (2020) Without Project		Future (2020) With Project				Future (2020) With Project + Mitigation			
			CMA	LOS	CMA	LOS	Impact	Significant	CMA	LOS	Impact	Significant
3	Hollywood and Wilcox	AM	0.947	E	0.952	E	+ 0.005	No	N/A			
		PM	0.903	E	0.913	E	+ 0.010	Yes	0.912	E	+ 0.009	No

Source: Table 15a, Traffic Impact Study, Overland Traffic, May *2017.*
Table by CAJA Environmental Services, May *2017.*

Table 3.16-8
CMA Summary With Mitigation (Current Baseline)

No.	Intersection	Peak Hour	Future (2020) Without Project		Future (2020) With Project				Future (2020) With Project + Mitigation			
			CMA	LOS	CMA	LOS	Impact	Significant	CMA	LOS	Impact	Significant
3	Hollywood and Wilcox	AM	0.949	E	0.953	E	+ 0.004	No	N/A			
		PM	0.921	E	0.931	E	+ 0.010	Yes	0.923	E	+ 0.009	No
4	Selma and Wilcox	AM	0.511	A	0.522	A	+ 0.011	No	N/A			
		PM	0.771	A	0.803	D	+ 0.032	Yes	0.799	C	+ 0.028	No

Source: Table 15b, Traffic Impact Study, Overland Traffic, May *2017.*
Table by CAJA Environmental Services, May *2017.*

Partial Off-site parking and valet operations

The required Project parking will be provided with 50 on-site parking spaces and 36 off-site parking spaces located at 1541 Wilcox Avenue with permitted parking reduction due to onsite bicycle parking (Scenario A). However, if the City, at its own discretion permits an additional 20% parking reduction in connection with the proposed zone change requests, the required Project parking will be 50 on-site parking spaces and 19 off-site parking spaces (Scenario B).

Valet service will be provided for the patrons of the hotel and ground floor restaurant. Valet services will be provided along the north side of Selma Avenue and east side of Wilcox Avenue along the Project frontages. The main drop-off vehicle valet service will be provided along Selma Avenue. Due to the shared usage between the existing restaurant and proposed hotel and restaurant of the valet service area on Selma Avenue. Some of the patrons will make use of or be direct to the valet service area on Wilcox Avenue. Vehicles that approach the site from the west along Hollywood Boulevard or Sunset Boulevard would need to continue on to Cahuenga Avenue to approach the Selma Avenue valet zone in the westbound direction. Vehicles approaching the site from the west on Selma Avenue, may utilize the valet station located on the eastern side of Wilcox Avenue. It has been conservatively estimated that 75% of visitors driving in will drop off their vehicles at the Selma Avenue valet station, 15% at the Wilcox Avenue valet station and 10% being employees self-parking. This would equate to 90% of the patrons using the valet service and 10% self-parking. The drivers who self-parked (estimated as 10%) would also leave without using the valet service. All of the patrons leaving (90% of the trips out) will use pickup vehicle valet services provided along the Wilcox Avenue valet service area.

Figure 1 in Appendix J-3 of this MND displays the valet service routes for drop-off and pick up of vehicles.

The approved traffic analysis routed all vehicles to the on-site parking garage on Wilcox Avenue. The addition of valet services on both Wilcox Avenue and Selma Avenue and the off-site parking lot have necessitated a revision to the distribution of Project trips. A majority of drivers will now approach the site westbound on Selma Avenue. Valets will then drive the vehicles to the on-site or off-site parking lots. These valet services will add additional vehicle trips.

Figure 2 in Appendix J-3 of this MND displays the revised trip distribution on approach and depart to the site and the addition of valet vehicle trips. The distribution is presented for all the study intersections. Intersection 4 (Selma Avenue and Wilcox Avenue) and intersection 5 (Sunset Boulevard and Wilcox Avenue) will have slightly different distribution patterns if the City permits an additional 20% parking reduction at its own discretion. If the additional reduction is permitted, the percentage of all vehicle trips parking off-site will be lower. However, if it is not granted, a greater number of vehicles will be parking off-site and create more circulation around the site at Selma Avenue & Wilcox Avenue and Sunset Boulevard & Wilcox Avenue due to the greater distance of travel and approach for the valets. These two distribution patterns are presented in Figure 2 with Scenario A incorporating the permitted vehicle parking reduction with bicycle parking and Scenario B incorporating the permitted vehicle parking reduction with bicycle parking and discretionary 20% parking reduction.

Note that AM and PM Peak Hour trip distribution varies because no left turns are permitted for northbound and southbound Cahuenga Boulevard at Hollywood Boulevard and at Selma Avenue. Figure 3 in Appendix J-3 of this MND displays the revised project trips through the study intersections.

Critical Movement Analysis (CMA) has been conducted at the ten (10) study intersections in the same manner as the approved May 2017 traffic study. This new analysis uses the trip generation as presented in the Traffic Study with the revised distribution and additional valet trips.

The updated Current Baseline, using modified trip distribution and incorporating valet trips for Scenario A with the permitted vehicle parking reduction with bicycle parking and Scenario B with the permitted vehicle parking reduction with bicycle parking and discretionary 20% reduction, is presented in Table 2 from Appendix J-3. The table is also provided below.

Table 2

CMA Summary – Modified Current Baseline with Valet Trips (A & B)

No.	Intersection	Peak Hour	Existing		Existing +Project			Significant Impact	Future (2020) Without Project			Future (2020) With Project			Significant Impact	Future (2020) With Project + MITIGATION			Significant Impact
			CMA	LOS	CMA	LOS	Impact		CMA	LOS	Growth	CMA	LOS	IMPACT		CMA	LOS	IMPACT	
1	Highland Av &	AM	0.479	A	0.484	A	+ 0.005	NO	0.761	C	+ 0.282	0.766	C	+ 0.005	NO				
	Selma Av	PM	0.432	A	0.439	A	+ 0.007	NO	0.847	D	+ 0.415	0.855	D	+ 0.008	NO				
2	Highland Av &	AM	0.881	D	0.882	D	+ 0.001	NO	1.015	F	+ 0.134	1.016	F	+ 0.001	NO				
	Sunset Bl	PM	0.758	C	0.760	C	+ 0.002	NO	0.958	E	+ 0.200	0.958	E	+ 0.000	NO				
3	Hollywood Bl &	AM	0.745	C	0.751	C	+ 0.006	NO	0.949	E	+ 0.204	0.955	E	+ 0.006	NO	N/A			
	Wilcox Av	PM	0.582	A	0.591	A	+ 0.009	NO	0.921	E	+ 0.339	0.931	E	+ 0.010	**YES**	0.930	E	+ 0.009	NO
4A	Selma Av &	AM	0.299	A	0.327	A	+ 0.028	NO	0.511	A	+ 0.212	0.539	A	+ 0.028	NO	N/A			
	Wilcox Av	PM	0.423	A	0.460	A	+ 0.037	NO	0.771	C	+ 0.348	0.808	D	+ 0.037	**YES**	0.800	C	+ 0.029	NO
																Mitigation:20% TDM Efffectiveness			
4B	Selma Av &	AM	0.299	A	0.321	A	+ 0.022	NO	0.511	A	+ 0.212	0.532	A	+ 0.021	NO				
	Wilcox Av	PM	0.423	A	0.453	A	+ 0.030	NO	0.771	C	+ 0.348	0.801	D	+ 0.030	**YES**	0.797	C	+ 0.026	NO
																Mitigation: 10% TDM Efffectiveness			
5A	Sunset Bl &	AM	0.549	A	0.558	A	+ 0.009	NO	0.655	B	+ 0.106	0.664	B	+ 0.009	NO				
	Wilcox Av	PM	0.581	A	0.586	A	+ 0.005	NO	0.773	C	+ 0.192	0.778	C	+ 0.005	NO				
5B	Sunset Bl &	AM	0.549	A	0.555	A	+ 0.006	NO	0.655	B	+ 0.106	0.661	B	+ 0.006	NO				
	Wilcox Av	PM	0.581	A	0.586	A	+ 0.005	NO	0.773	C	+ 0.192	0.778	C	+ 0.005	NO				
6	Cahuenga Bl &	AM	0.882	D	0.885	D	+ 0.003	NO	1.101	F	+ 0.219	1.104	F	+ 0.003	NO				
	Hollywood Bl	PM	0.669	B	0.675	B	+ 0.006	NO	0.885	D	+ 0.216	0.892	D	+ 0.007	NO				
7	Cahuenga Bl &	AM	0.413	A	0.431	A	+ 0.018	NO	0.643	B	+ 0.230	0.661	B	+ 0.018	NO				
	Selma Av	PM	0.433	A	0.445	A	+ 0.012	NO	0.657	B	+ 0.224	0.669	B	+ 0.012	NO				
8	Cahuenga Bl &	AM	0.821	D	0.827	D	+ 0.006	NO	0.992	E	+ 0.171	0.998	E	+ 0.006	NO				
	Sunset Bl	PM	0.736	C	0.739	C	+ 0.003	NO	0.936	E	+ 0.200	0.939	E	+ 0.003	NO				
9	Hollywood Bl &	AM	0.777	C	0.779	C	+ 0.002	NO	0.933	E	+ 0.156	0.935	E	+ 0.002	NO				
	Vine Street	PM	0.745	C	0.747	C	+ 0.002	NO	0.945	E	+ 0.200	0.948	E	+ 0.003	NO				
10	Sunset Bl &	AM	0.827	D	0.830	D	+ 0.003	NO	1.004	F	+ 0.177	1.006	F	+ 0.002	NO				
	Vine Street	PM	0.875	D	0.878	D	+ 0.003	NO	1.083	F	+ 0.208	1.083	F	+ 0.000	NO				

Traffic Mitigation: # 3 & #4B PM Peak Hour - Transportation Demand Management (TDM) with 10% effectiveness mitigates to a level of insignificance

Traffic Mitigation: #4A PM Peak Hour - Transportation Demand Management (TDM) with 20% effectiveness mitigates to a level of insignificance

As shown in Table 2 above, the conclusions of the May 2017 traffic study have not changed. The intersection of Hollywood Boulevard and Wilcox Avenue is significantly impacted during the PM Peak Hour in the Current Baseline analysis during the Future With Project analysis. The intersection of Selma Avenue and Wilcox Avenue is significantly impacted during the PM Peak Hour in Current Baseline analysis during the Future With Project analysis. These impacts are mitigated below a level of significance with the implementation of a TDM Plan with a 10% effectiveness. However, if the City does not grant an additional discretionally 20% parking reduction, the TDM Plan will need to provide additional elements for a more robust 20% effectiveness to mitigate the additional valet trips through the intersection of Selma Avenue and Wilcox Avenue.

Original Baseline

Under the Original Baseline, the Project would be required to implement **MM-Traffic-1** and **MM-Traffic-2**, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would be required to implement **MM-Traffic-1** and **MM-Traffic-2**, and the impacts will be less than significant.

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 Metro thresholds for a significant project impact would be exceeded. The 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 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 of Los Angeles 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 two percent in the demand to capacity ratio when at LOS F. For purposes of CMP intersections, an increase of 50 vehicles or more during the AM or PM Peak requires further analysis.

The intersection of Santa Monica and Highland Avenue is the nearest CMP intersection. This CMP intersection is approximately three quarters of a mile from the Project Site. It is anticipated that a conservative maximum of 10 percent of Project trips will go through the intersection during the peak periods which would equate to 10 trips during the PM Peak Hour. This is below the CMP significance threshold 50 vehicles or more added during the peak hours.

The Project volumes on the area freeways are anticipated to be dispersed throughout the system. The Project is closest to the Hollywood Freeway. It is anticipated that, conservatively, no more than 20 percent 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 20 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.

Supplemental Caltrans Analysis (Screening Criteria)

The City of Los Angeles Department of Transportation (LADOT) and Caltrans District 7 have developed an agreement on the Freeway Impact Procedures, the "Caltrans Agreement", updated December 2015. This multi-agency agreement describes a screening process to determine the level of analysis necessary for land development projects. The screening criterion is based on the traffic volume and capacity of nearby freeway and ramp facilities, and the estimated volume of added project traffic. Four screening criterion have been developed by LADOT and Caltrans. If any of the four criteria described below are satisfied then additional traffic impact analysis is required.

1. The project's peak hour trips would result in a 1% or more increase to the freeway mainline capacity of a freeway segment operating at a level of service (LOS) E or F (based on a capacity of 2,000 vehicles per hour per lane (vphpl)).

2. The project's peak hour trips would result in a 2% or more increase to the freeway mainline capacity of a freeway segment operating at a level of service (LOS) D (based on a capacity of 2,000 vphpl).

3. The project's peak hour trips would result in a 1% or more increase to the freeway off ramp operating at a level of service (LOS) E or F (based on an off-ramp capacity of 850 vphpl as measured at the intersection).

4. The project's peak hour trips would result in a 2% or more increase to the freeway off ramp operating at a level of service (LOS) E or F (based on an off-ramp capacity of 850 vphpl as measured at the intersection).

Review Criteria 1 and 2 - The Hollywood Freeway (US 101) mainline has a directional capacity of 8,000 vph (4 lanes x 2,000 vphpl). Evaluating the 101 Freeway north of Cahuenga Boulevard and south of Sunset Boulevard would capture the highest volume of freeway traffic generated by the project. Using the worst-case criteria of a 1% increase, the project would need to add 80 vph per direction to the mainline freeway segment to warrant further review. As indicated below in Table 3.16-9, none of the freeway

segments with the highest volume of project traffic would meet the screening criterion during either peak hour in either direction and, therefore, no additional analysis is necessary.

Table 3.16-9
Freeway Segment Summary

Location	Dir	# of Lanes	Capacity	Project Trips		% Increase	
				AM	PM	AM	PM
Freeway Segment (2,000 vehicles per hour per lane)							
Hollywood Freeway (US-101) at north of Cahuenga Bl	NB	4	8,000	6	9	0.1%	0.1%
Hollywood Freeway (US-101) at north of Cahuenga Bl	SB	4	8,000	9	11	0.1%	0.1%
Hollywood Freeway (US-101) at south of Sunset Bl	NB	4	8,000	9	11	0.1%	0.1%
Hollywood Freeway (US-101) at south of Sunset Bl	SB	4	8,000	6	9	0.1%	0.1%

Source: Table 13, Traffic Impact Study, Overland Traffic, May 2017.
Table by CAJA Environmental Services, May 2017.

Review Criteria 3 and 4 - The Hollywood Freeway ramps serving the highest project traffic volume are the southbound off ramps to Cahuenga Boulevard or Van Ness Street and northbound off ramps to Sunset Boulevard or Wilton Place. The southbound off ramps and Wilton Place northbound ramps are two lanes each and the northbound off ramp to Sunset Boulevard is a single free lane. Pursuant to the screening criteria, the off-ramp capacity would be 850 vphpl. As indicated below in Table 3.16-10, none of the off ramps would meet the screening criterion. Therefore, no further Caltrans analysis is required.

Table 3.16-10
Caltrans Off Ramp Summary

Location	Dir	# of Lanes	Capacity	Project Trips		% Increase	
				AM	PM	AM	PM
Off tramp Segment (1,500 vehicles per hour per lane)							
SB Hollywood Freeway (US-101) to Cahuenga Bl	SB	2	1,700	5	6	0.3%	0.4%
SB Hollywood Freeway (US-101) to Van Ness St	SB	2	1,700	4	5	0.2%	0.3%
NB Hollywood Freeway (US-101) to Sunset Bl (free lane)	NB	1	850	5	6	0.6%	0.7%
NB Hollywood Freeway (US-101) to Wilton Pl	NB	2	1,700	4	5	0.2%	0.3%

Source: Table 14, Traffic Impact Study, Overland Traffic, May 2017.
Table by CAJA Environmental Services, May 2017.

Original Baseline

Under the Original Baseline, the Project would not conflict with the CMP, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not conflict with the CMP, and the impacts will be less than significant.

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.

Original Baseline

Under the Original Baseline, the Project will not 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, and no impacts to air traffic patterns will occur.

Current Baseline

Under the Current Baseline, the Project will not 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, and no impacts to air traffic patterns will occur.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant with Mitigation Incorporated. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Pedestrian Safety

Temporary impacts to pedestrian safety could occur along Selma Avenue. The Project will be required to comply with and obtain approvals from the Bureau of Street Services and the Department of Building and Safety, pursuant to LAMC Section 62.45 (Materials or Equipment in Streets, Permits, Regulations, Fees) and 91.3306 (Protection of Pedestrians). This compliance will ensure the safety of pedestrians, as the construction area could create hazards. The Adopted MND contained Mitigation Measure 16-1, for protections to pedestrians due to construction safety hazards. These have now become incorporated as regulatory measures of the LAMC and the mitigation measure is no longer needed. Therefore, impacts will be less than significance.

Proximity to a School

The nearest is Selma Elementary School, approximately 700 feet to the west. The school would be generally shielded from the Project Site by intervening residential and commercial buildings on Selma Avenue. 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. However, the Project would notify the LAUSD Transportation Branch regarding proposed construction to ensure that school buses have unrestricted access to schools. (see Mitigation Measure MM-Traffic-3).

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.

Original Baseline

Under the Original Baseline, the Project would be required to implement **MM-Traffic-3**, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would be required to implement **MM-Traffic-2**, and the impacts will be less than significant.

Mitigation Measure

MM-Traffic-3 The developer and contractors shall maintain ongoing contact with administrator of Selma Elementary School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the LAUSD's Transportation Branch (213)580-2950 or (213)580-2900 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.

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

Parking will be provided both on and off-site with valet services provided. The code required Project parking will be provided with 50 on-site parking spaces and 36 off-site parking spaces located at 1541 Wilcox Avenue. Valet service will be provided for the patrons of the hotel and amenities. Valet services will be provided along the north side of Selma Avenue and east side of Wilcox Avenue along the Project frontages. The main drop-off vehicle valet service will be provided along Selma Avenue. It is estimated that 75% of visitors driving in will drop off their vehicles at the Selma Avenue valet station, 15% at the Wilcox Avenue valet station and 10% being employees self-parking. This would equate to 90% of the patrons using the valet service and 10% self-parking. The drivers who self-parked (estimated as 10%) would also leave without using the valet service. All of the patrons leaving (90% of the trips out) will use pick-up vehicle valet services provided along the Wilcox Avenue valet service area.

Table 2-2 – Vehicle Parking, in Section 2 of this IS/MND, provides the amount of required parking by land use type and quantity. If the square footages of the Project are reduced, the parking requirement will be reduced accordingly. 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. Emergency access to the Project Site would be maintained on Selma Avenue and Wilcox Avenue.

Original Baseline

Under the Original Baseline, the Project does result in inadequate emergency access, and the impacts related to emergency access will be less than significant.

Current Baseline

Under the Current Baseline, the Project does result in inadequate emergency access, and the impacts related to emergency access will 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 Metro, the City of Los Angeles Department of Transportation Dash service (DASH), subway Metro Rail, and Metro Express. The Metro Red Line provides rail service to Downtown Los Angeles, Koreatown, Hollywood, and North Hollywood. The Project Site is approximately 1,500 feet southwest of Metro's Hollywood/Vine Station and approximately 2,700 feet southeast of Metro's Hollywood/Highland Station. In addition the following are within 650 feet of the Site:

- Metro Route 217 along Hollywood Boulevard provides service between Westchester and Hollywood along La Cienega Avenue, Fairfax Avenue and Hollywood Boulevard.
- Metro Route 780 along Hollywood Boulevard is a Rapid Service between Pasadena, Eagle Rock, Glendale, Los Feliz and Hollywood.
- Metro Route 156/656 along Highland Avenue operates between Hollywood and East San Fernando Valley including Studio City, Van Nuys and Panorama City.
- Metro Route 2/302 on Sunset Boulevard operates between Pacific Palisades, Westwood, West Hollywood, Hollywood and downtown Los Angeles.
- Metro Route 210 operates between Hollywood and Torrance.
- 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

As per CMP, 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 percent. 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 Project site 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	1,227	70	100
Person Trips (x 1.4)	1,718	98	140
Transit Trips (person trips x 3.5%)	**60**	**3**	**5**

Source: Table 12, Traffic Impact Study, Overland Traffic, May 2017.
Table by CAJA Environmental Services, May 2017.

Bicycles

The City adopted a 2010 Bicycle Master Plan (Master Plan) to encourage alternative modes of transportation throughout the City. 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.

The Mobility 2035 Plan has identified a Bicycle Enhanced Network. The Mobility 2035 Plan indicates that Tier 2 bicycle lanes are more likely to be built by 2035 than Tier 3 lanes. This Mobility 2035 Plan entails roadways be improved with bike detectors at actuated signals. Hollywood Boulevard is identified as Tier 1 protected bicycle lane. Cahuenga Boulevard and Selma Avenue are identified as part of the neighborhood bikeway network. Hollywood Boulevard, Sunset Boulevard, Selma Avenue and Cahuenga Boulevard are all identified as study corridors for bikeways.

LAMC Section 12.21-A.16(a)(2) requires new Projects to provide bicycle parking spaces per building floor area. A hotel is required to provide one short-term bicycle space per 20 guest rooms and one long-term bicycle space per 20 guest rooms. A restaurant and retail is required to provide one short-term and one long-term bicycle space per 2,000 square feet. 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, 7 short-term and 7 long-term bicycle spaces. The Project will provide 34 bicycle parking spaces in accordance with LAMC Section 12.21-A. The Project would not impede development of bicycle facilities from the Master Plan and would provide adequate bicycle parking. Therefore, under the Original Baseline and Current Baseline, impacts to bicycles will be less than significant.

Pedestrian Facilities

Temporary fencing and scaffolding/walkways (as appropriate) will be provided to protect pedestrians from the construction work. During operation, the Project would not impact any sidewalks. There is a

controlled/lighted crosswalk at the intersections of Selma Avenue/Wilcox Avenue and Selma Avenue/Cahuenga Boulevard. There are no public benches or seating along the sidewalks. The Project will not conflict with public transit, bicycles, or pedestrian facilities. Therefore, under the Original Baseline and Current Baseline, impacts will be less than significant.

Original Baseline

Under the Original Baseline, the Project will not conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, and the impacts related to these facilities will be less than significant.

Current Baseline

Under the Current Baseline, the Project will not conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, and the impacts related to these facilities will be less than significant.

17. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact.

Original Baseline

Under the Original Baseline, the Project includes the demolition of three existing buildings (a restaurant, piano bar, and retail/residential building) that were constructed in 1923. The piano bar building and the retail and residential building to be removed were evaluated and determined to have a National Register Historic Places Status Code of 6Z, which means the resource has been significantly altered and contains little or no integrity.[176] None of the buildings have been identified as requiring Historic Preservation Review.[177] An Intensive Historic Resource Survey in the Hollywood Redevelopment Project Area identified all three buildings on the Project Site as category 6Z[178] (Found ineligible for National Register, California Register or local designation through survey evaluation).[179]

Therefore, under the Original Baseline, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, and no impact will occur.

Current Baseline

Under the Current Baseline, the Project would construct a building above the existing building and excavated area at the Project Site, which was constructed in 2016-2017 and would remain. Therefore, under the Current Baseline, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, and no impact will occur.

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[176] *http://preservation.lacity.org/files/Hollywood_DPR_Forms_Individual_Resources_6Z_2_of_3.pdf.*

[177] *City of Los Angeles, ZIMAS Parcel profile: http://zimas.lacity.org/.*

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

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

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact. Approved by Governor Jerry Brown on September 25, 2014, AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. Public Resources Code Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, Public Resources Code Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. Public Resources Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, state, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

In compliance with AB 52, the City provided notice to tribes soliciting requests for consultation on June 5, 2017, and this 30-day notification period ended July 5, 2017. On June 7, 2017, the Gabrieleno Band of Mission Indians–Kizh Nation (Tribe) submitted a comment stating that the site is located within a sensitive area and may cause a substantial adverse change in significance of our tribal cultural resources, and requested a consultation. The tribe has not submitted or provided substantial evidence indicating that

the Project Site is located within a sensitive area. On June 8, 2017, the City responded to the request for consultation requesting availability for consultation. No response to the request to schedule a consultation was received. On June 15, 2017, the City sent a follow up request to schedule a consultation. As of December 18, 2017, there has been no response from the Tribe to conduct the consultation.

As previously discussed under Question 5(b), the Project Site does not contain any known archaeological sites or archaeological survey areas. The NAHC was contacted for information and to conduct a Sacred Lands File Search (SLFS). The NAHC responded on May 19, 2016 (included as Appendix E of this MND) and provided the Tribal Consultation List. Per their response, "A search of SFL was completed for the USGS quadrangle information provided above with negative results." In addition, the Project would comply with existing regulations, which would protect any potential archaeological resources that are discovered during excavation and would comply with existing regulations regarding the finding of and identification of any human remains, which may be discovered. This would include following existing regulations requiring the notification of the NAHC. As no substantial evidence has been provided from the Tribe to indicate that the Project Site is located within a sensitive area and records search has provided negative results, impacts to tribal artifacts are anticipated to be less than significant.

Original Baseline

Under the Original Baseline, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource that a resource determined by the City to be significant, and impacts to tribal cultural resources will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource that a resource determined by the City to be significant, and impacts to tribal cultural resources will be less than significant.

18. UTILITIES AND SERVICE SYSTEMS

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

K-1 Wastewater Response, Los Angeles Bureau of Sanitation, June 13, 2016.

K-2 Wastewater Response, Los Angeles Bureau of Sanitation, August 17, 2016.[180]

K-3 Water and Power Response, Los Angeles Bureau of Sanitation, October 4, 2016.

K-4 Natural Gas Response, Southern California Gas Company, May 18, 2016.

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 LARWQCB implements programs to protect all waters in the coastal watersheds for Los Angeles and Ventura counties. LARWQCB'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.[181] Wastewater reclamation and treatment in the City 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 LARWQCB and/or water reclamation requirements of the Basin Plan.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP)[182], which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment,[183] and currently treats an average daily flow of approximately 362 mgd.[184] Thus, there is a remaining capacity of approximately 88 mgd. Full secondary treatment prevents virtually all particles suspended in effluent

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[180] *The June 13, 2016 response letter was a response to CAJA's initial request for existing information and provided an estimate of wastewater flow based on a hotel and pool uses. The August 17, 2016 was a response to the City Planning Department for a review of the Project. It takes into account more details such as the restaurant and other uses. Both letters indicate that the estimated flow should be accommodated. The estimate flow in this MND is based on a more reasonable assessment of the pool flow and is well within the larger, more conservative flows from the two Wastewater responses.*

[181] *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).*

[182] *LA Sewers: http://www.lasewers.org/treatment_plants/about/index.htm.*

[183] *Los Angeles Sanitation: http://www.lacitysan.org/irp/Wastewater.htm.*

[184] *LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: http://www.lacitysan.org/wastewater/factsfigures.htm.*

from being discharged into the Pacific Ocean and is consistent with the LARWQCB's discharge policies for Santa Monica Bay. Additionally, the City's Sewer Allocation Ordinance (Ordinance No. 166,060) limits the annual increase in wastewater flow to HTP to five mgd.[185] 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 discharge is typical of the area and would not require any on-site treatment before flowing to the sewer.

Original Baseline

Under the Original Baseline, the Project would not exceed wastewater treatment requirements of the LARWQCB, and the impacts related to wastewater treatment will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not exceed wastewater treatment requirements of the LARWQCB, and the impacts related to wastewater treatment will be less than significant.

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 Impact. 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 3.18-1 – Project Estimated Wastewater Generation*, it is estimated the Project will generate a net total of approximately 20,583 gallons per day (gpd) (or 0.021 mgd) of wastewater. This total represents a more conservative result since it does not take any credit for the existing uses that would be removed (under the Original Baseline and Current Baseline). It also does not take any credit for the proposed sustainable and water conservation features of the Project.[186]

[185] *Los Angeles City Clerk, Ordinance 166,060: http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=87-2121*

[186] *Tao restaurant wastewater generation was calculated in the Adopted MND and are not included as part of the Project.*

Table 3.18-1
Project Estimated Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Project			
Hotel	114 rooms	120 gallons / room	13,680
Pool	15 x 40 feet	100 gallons / day	273
Restaurant and Bar*	221 seats	30 gallons / seat	6,630
		Total Increase	**20,583**

Note: sf = square feet; gpd = gallons per day
**Restaurant and bars use their combined total seating to estimate wastewater. The flow per seat (rather than square footages) is a more conservative factor.*
Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf.
Includes amount to fill the pool twice per year, pro-rated by daily amount. Pool water loss due to evaporation is estimated at 100 gallons per day: http://www.americanleakdetection.com/swimming-pool-water-loss-calculator.php
Table: CAJA Environmental Services, April 2017.

The Project Site will be served by LABS, which provides municipal wastewater services to the City. The sewer infrastructure includes:[187]

- 10-inch line on Selma Avenue that flows west; and
- 8-inch line on Wilcox Avenue that flows south.

The Project Site is 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. A final approval for sewer capacity and connection permit will be made at that time. Implementation of this mitigation measure would ensure that the Project's impacts to the wastewater conveyance system will be less than significant.

The wastewater generated by the Project will be similar to other hotel and commercial uses in the Project Site 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

[187] *Wastewater Response, Los Angeles Bureau of Sanitation, August 17, 2016.*

on treatment plant capacity. As the 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 LARWQCB. Therefore, impacts with regard to wastewater treatment requirements will be less than significant.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) would be implemented as part of the Project and will help reduce the amount of project-generated wastewater. Therefore, with the mitigation detailed below, impacts to wastewater treatment facilities and existing infrastructure will be less than significant.

Water Consumption and Treatment Facilities

The LADWP provides municipal water services to the City, and is responsible for providing water to the Project Site. As shown on *Table 3.18-2 – Project Estimated Water Consumption*, it is estimated the Project will consume a net total of approximately 26,275 gpd (or 0.026 mgd or 29.5 acre-feet per year[188]) of water. This total represents a more conservative result since it does not take any credit for the existing uses that would be removed (under the Original Baseline and Current Baseline). It also does not take any credit for the proposed sustainable and water conservation features of the Project.[189]

Table 3.18-2
Project Estimated Water Consumption

Land Use	Size	Water Consumption Rates	Total (gpd)
Project			
Hotel	114 rooms	153.6 gallons / room	17,510
Pool	15 x 40 feet	100 gallons / day	279
Restaurant and Bar*	221 seats	38.4 gallons / seat	8,486
		Total Increase	**26,275**

Note: sf = square feet; gpd = gallons per day
**Restaurant and bars use their combined total seating to estimate wastewater. The flow per seat (rather than square footages) is a more conservative factor.*
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.
Includes amount to fill the pool twice per year, pro-rated by daily amount. Pool water loss due to evaporation is estimated at 100 gallons per day: http://www.americanleakdetection.com/swimming-pool-water-loss-calculator.php
Table: CAJA Environmental Services, April 2017.

[188] *1 acre foot = 325,851.429 US gallons. 18,554 x 365 / 325,851 = 20.7.*

[189] *Tao restaurant water demand was calculated in the Adopted MND and are not included as part of the Project.*

The LADWP's Water Service Organization (WSO) should 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.

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 will 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. Regulations will ensure that the Project's impacts (under the Original Baseline and Current Baseline) to the water conveyance system will be less than significant. The Adopted MND included Mitigation Measures 17-1 and 17-2. The mitigation measures are consistent with existing regulations as it pertains to wastewater and water service. Thus compliance with the existing regulations would reduce impacts to a less than significant level without the incorporation of the previously adopted mitigation measures.

Prior to the development of a new building, the capacity of the on-site sanitary sewers that would serve the building shall be evaluated based on applicable Bureau of Sanitation and California Plumbing Code standards and replacement or new sanitary sewers shall be installed on-site as necessary to accommodate proposed flows.

As part of the normal construction/building permit process, the 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 applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. If street closures for construction are required, the applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety and minimize interruption to the street and sidewalk.

New on-site water mains and laterals would be installed in accordance with City Plumbing Code requirements, where necessary, to distribute water within the Project Site.

As part of the normal construction/building permit process, the applicant shall confirm with the LADWP 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 applicant shall be required to build water lines to a point in the system with sufficient capacity. If street closures for construction are required, the applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety and minimize interruption to the street and sidewalk.

Original Baseline

Under the Original Baseline, the Project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, and the impacts will be less than significant.

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 was previously developed. The Project will similarly cover the entire site with a building. Thus, the Project would not be altering the amount of impervious surface that affects runoff. Runoff currently flows toward the existing storm drain system, and the Project will not substantially alter the amount of runoff.

Impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles, SWRCB, and LID requirements. The Project is required to implement stormwater control measures during its construction phase. Any construction during the rainy season (between October 1 and April 15) would implement a WWRCP. 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.

Original Baseline

Under the Original Baseline, the Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, and the impacts will be less than significant.

d) Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the MWD, 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

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 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 8,539 square feet of restaurant and bar spaces and up to 114 hotel rooms.

Drought Conditions

On January 17, 2014, Governor Jerry Brown officially declared California in a drought emergency. LADWP has activated the Water Conservation Response Unit in order to implement the mandatory Emergency Water Conservation Plan Ordinance - Phase 2. This includes an odd/even numbered address watering calendar. In addition, customers cannot: 1) Use water on hard surfaces such as sidewalks, walkways, driveways, or parking areas (with exception of water brooms); 2) Irrigate landscaping between the hours of 9:00 AM. and 4:00 PM.; 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.[190] The 2015 Urban Water Management Plan (UWMP) 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 five percent lower than normal demands on average; while water demands under hot/dry weather conditions could be as much as five percent higher than normal demands on average.[191]

On April 1, 2015, Governor Jerry Brown signed Executive Order B-29-15, which provides actions that will save water, increase enforcement to prevent wasteful water use, streamline the state's drought response, and invest in new technologies to make California more drought resilient. Executive Order B-29-15 provides water savings by directing the SWRCB to implement mandatory water reductions in cities and towns to reduce water usage by 25 percent or approximately 1.5 million acre-feet. Executive Order B-29-15 calls for local water agencies to implement conservation pricing to discourage water waste.[192] State-mandated conservation and reductions are implemented by LADWP.

On April 7, 2017, Governor Brown signed Executive Order B-40-17, which ended the drought state of emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne, where emergency

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[190] *LADWP, Drought Information: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation/a-w-c-droughtbusters?_adf.ctrl-state=nviecbhak_4&_afrLoop=932704326968157.*

[191] *2015 Urban Water Management Plan, Los Angeles, pg. ES-12: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply/a-w-sos-uwmp?_afrLoop=476955298450592&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D476955298450592%26_afrWindowMode%3D0%26_adf.ctrl-state%3Ds82ee5qky_17, February 6, 2017.*

[192] *California Governor: http://gov.ca.gov/news.php?id=18910, February 6, 2017.*

drinking water projects will continue to help address diminished groundwater supplies. It maintains water reporting requirements and prohibitions on wasteful practices.[193]

The Project is estimated to use approximately 29.4 acre-feet per year (AFY). The 2015 UWMP was adopted in June 2016 and projects a demand of 611,800 AFY in 2020 and 644,700,000 AFY in 2025.[194] The UWMP 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 SCAG 2012 RTP (the 2016 RTP was not finalized during the preparation of the 2015 UWMP).[195] The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).[196] Neither the UWMP forecasts, nor the 2012 RTP include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use, and does not propose a General Plan Amendment or Zone Change. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, Los Angeles aqueduct) is offset with MWD purchases to rise to the level of demand. As set forth above, the Project is consistent with the General Plan.

The following regulatory compliance would ensure that impacts related to the project's water demand remain less than significant:

The Project shall implement all applicable mandatory measures of Ordinance No. 180,822 (The Water Efficiency Requirements for New Development), the 2017 Los Angeles Plumbing Code, 2016 California Green Building Code, and 2016 LAGBC that would have the effect of reducing the Project's water use.

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).

The Project shall comply with the City's LID Ordinance (City Ordinance No. 181,899) and implement BMPs that have stormwater recharge or reuse benefits for the Project (as applicable and feasible).

Original Baseline

[193] *http://www.water.ca.gov/waterconditions/declaration.cfm*

[194] *2015 Urban Water Management Plan, Los Angeles, pg. ES-23.*

[195] *2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.*

[196] *SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.*

Under the Original Baseline, the Project will have sufficient water supplies available to serve the Project from existing entitlements and resources, and the impacts will be less than significant.

Current Baseline

Under the Current Baseline, the Project will have sufficient water supplies available to serve the Project from existing entitlements and resources, and the impacts will be less than significant.

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 0.015 mgd of wastewater would be sufficiently accommodated as part of the remaining 88 mgd or 80 percent of treatment capacity currently available at the HTP. Also, the HTP has sufficient capacity for the Project's flow.

Original Baseline

Under the Original Baseline, the wastewater treatment provider has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments, and the impacts related to wastewater treatment will be less than significant.

Current Baseline

Under the Current Baseline, the wastewater treatment provider has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments, and the impacts related to wastewater treatment will be less than significant.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Forty-three percent of the waste generated in the City is disposed of at the Sunshine Canyon City/County Landfill, with 20 percent to Chiquita Canyon Landfill, and the remaining amounts sent to over a dozen other landfills, recycling, refuse-to-energy, or resource recovery facilities.[197]

Facilities

[197] *City of Los Angeles, Fact Sheet: Solid Waste Facilities: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf*

The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day (tpd) and accepted an average of 7,582 tpd (2014 daily average).[198] It is expected to close in 2037.[199] It has a remaining daily intake availability of 4,993 tpd, and has approximately 96.8 million cubic yards (cy) of remaining capacity out of a total capacity of 140.9 million cy.[200] As of September 30, 2013, Sunshine Canyon Landfill accepted approximately 7,800 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).[201] Space is calculated by volume, with 1.7 cy equaling one ton of trash. Projections of capacity are tied to how tightly the trash is compacted.[202] Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 4,300 tpd during each weekday and 9,100 tpd on Saturday.

There are two solid waste transformation facilities within Los Angeles County. The Commerce Refuse-to-Energy Facility has a permitted intake 1,000 tpd and accepted an average of 337 tpd (2013 daily average). It has a remaining daily intake availability of 663 tpd.[203] The Southeast Resource Recovery Facility, located in the City of Long Beach, has a permitted intake 2,240 tpd and accepted an average of 1,504 tpd (2013 daily average). It has a remaining daily intake availability of 736 tpd.[204] It is expected that these two facilities will continue to operate at their current permitted capacities through the planning period of 2022. The owners and operators of these facilities have indicated that there are no plans to increase the daily capacity. The County of Los Angeles is exploring the use of conversion technologies to reduce future disposal needs as well as address global climate change. These technologies encompass a variety of processes that convert normal household trash into renewable energy, biofuels, and other useful products. The County of Los Angeles has launched the Southern California Conversion Technology Demonstration Project, which seeks to promote, evaluate, and establish a demonstration facility for the conversion of solid waste into clean energy.[205] Additionally, the County of Los Angeles recently completed its final

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[198] *County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: http://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, February 6, 2017.*

[199] *23 years remaining life as of 2014 Annual Report, prepared in December 2015.*

[200] *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, February 6, 2017.*

[201] *Sunshine Canyon Landfill Newsletter, Fall 2013 (latest newsletter), website: http://www.sunshinecanyonlandfill.com/home/newsletter/fall_2013_newsletter.pdf, February 6, 2017.*

[202] *Sunshine Canyon: http://www.sunshinecanyonlandfill.com/home/Future.html, February 6, 2017.*

[203] *County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: http://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, February 6, 2017.*

[204] *County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: http://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, February 6, 2017.*

[205] *Los Angeles County Phase II Conversion Technology Evaluation Report - October 2007, http://www.socalconversion.org/pdfs/LACo_Conversion_PII_Report.pdf, October 8, 2014.*

Phase II Conversion Technology Evaluation Report, which provides a comprehensive study of existing technology suppliers and materials recovery facilities throughout southern California.

The Puente Hills Materials Recovery Facility (MRF) accepts all kinds of waste for recycling and disposal, including commercial, construction/demolition, and residential wastes.[206] The Puente Hills MRF is permitted to accept 4,400 tpd and 24,000 tons per week of municipal solid waste.[207] 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.[208] The Mesquite Landfill can accept 20,000 tpg, with an overall capacity of 600 million tons and a lifespan of 100 years.[209] 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.

Construction

Construction of the Project will generate 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. 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.

Construction of the 57,774 square feet of new floor area would generate approximately 127 tons of construction waste.[210] Core/shell construction is estimated to take approximately 18 months. Therefore, Project construction would generate approximately 0.35 tpd of construction waste on average throughout the construction phase.[211] It is anticipated that the Project's construction debris would be transported to the Sunshine Canyon Landfill in Sylmar.

Original Baseline

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[206] *County Sanitation Districts, Puente Hills Landfill Closing on October 31, 2013: http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1.*

[207] *County Sanitation Districts, Puente Hills MRF Fact Sheet: http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1.*

[208] *Puente Hills Landfill: http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=3708.*

[209] *Mesquite Regional Landfill: http://www.mrlf.org/index.php?pid=5.*

[210] *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).*

[211] *18 months x 20 working days per month = 360 working days. 127 tons / 360 days = 0.35 tons per day.*

Under the Original Baseline, there is a landfill with sufficient permitted capacity to accommodate the Project's construction-related solid waste disposal needs, and the impacts related to wastewater treatment will be less than significant.

Current Baseline

Under the Current Baseline, there is a landfill with sufficient permitted capacity to accommodate the Project's construction-related solid waste disposal needs, and the impacts related to wastewater treatment will be less than significant.

Operation

As shown on *Table 3.18-3 – Project Estimated Solid Waste Generation*, it is estimated the Project would generate a net total of approximately 1,043 pound per day (or 0.52 tons per day) of solid waste. This total represents a more conservative result since it does not take any credit for the existing uses that would be removed (under the Original Baseline and Current Baseline). It also does not take any credit for the proposed sustainable and recycling features of the Project. [212]

Table 3.18-3
Project Estimated Solid Waste

Land Use	Size	Solid Waste Generation Rates	Total (pounds)
Project			
Commercial	94 employees	11.1 pounds / employee	1,043
		Total Increase	**1,043**
Note: sf = square feet *http://www.calrecycle.ca.gov/lgcentral/goalmeasure/DisposalRate/MostRecent/default.htm* *Table: CAJA Environmental Services, April 2017.*			

The Sunshine Canyon Landfill can accept 12,100 tpd (and currently accepts 7,800 tpd on weekdays and 3,000 tpd on Saturday), and could therefore accommodate the additional approximately 0.25 tpd increase in solid waste resulting from the Project. 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 2013-14, the City exceeded the mandated 75 percent diversion rate goal, achieving 76.4 percent,[213] with the goal to achieve

[212] *Tao restaurant solid waste generation was calculated in the Adopted MND and are not included as part of the Project.*

[213] *City of Los Angeles, Department of Public Works, Annual Report, 2013-14: http://bpw.lacity.org/DPW-2013-14-ANNUAL-REPORT.pdf, February 6, 2017.*

a 90 percent diversion by 2025.[214] The regulatory compliance items listed below would ensure that solid waste is separated and disposed/recycled properly during operation further mitigating any potential solid waste impact from Project operations.

In compliance with LAMC, the Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

In order to meet the diversion goals of the California Integrated Waste Management Act and the City, which will total 70 percent by 2013, the applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the LAMC, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an AB 939 Compliance Permit from the LABS.

In compliance with AB 341, 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. The applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.

Original Baseline

Under the Original Baseline, there is a landfill with sufficient permitted capacity to accommodate the Project's operation-related solid waste disposal needs, and the impacts related to wastewater treatment will be less than significant.

Current Baseline

Under the Current Baseline, there is a landfill with sufficient permitted capacity to accommodate the Project's operation-related solid waste disposal needs, and the impacts related to wastewater treatment will be less than significant.

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

[214] *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 February 24, 2014.*

to solid waste, such as AB 939. The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Integrated Resources Plan, which is the long-range solid waste management policy plan for the City through 2025, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills. The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction, and the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials. Waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Sunshine Canyon Landfill has adequate capacity and is slated to close in 2037. The Waste-By-Rails program to the Mesquite Landfill would have adequate capacity and is slated to operate for 100 years. The Project would comply with federal, state, and local regulations, and as such, impacts will be less than significant.

Original Baseline

Under the Original Baseline, the Project would comply with federal, state and local statutes and regulations related to solid waste, and the impacts related to solid waste will be less than significant.

Current Baseline

Under the Current Baseline, the Project would comply with federal, state and local statutes and regulations related to solid waste, and the impacts related to solid waste will be less than significant

ENERGY ANALYSIS

Regulatory Framework

State Building Energy Efficiency Standards

New buildings in California are required to conform to energy conservation standards specified in Title 24 of the California Code of Regulations. The CALGreen establishes "energy budgets" for different types of residential and nonresidential buildings, with which all new buildings must comply. The energy budget has a space conditioning component and a water-heating component, both expressed in terms of energy (British thermal units, or BTU) consumed per year. The regulations allow for trade-offs within and between the components to meet the overall budget. The building efficiency standards are enforced through the local building or individual agency permit and approval processes.[215]

CALGreen Code

[215] *CALGreen: http://www.documents.dgs.ca.gov/bsc/CALGreen/2010_CA_Green_Bldg.pdf, February 6, 2017.*

Part 11 of the Title 24 California Building Standards Code is referred to as the CALGreen. The purpose of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." As of January 1, 2017, the CALGreen Code is mandatory for all new buildings constructed in the state. The CALGreen Code establishes mandatory measures for new residential and non□residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2017.

2015 Final Power Integrated Resource Plan[216]

The LADWP released the 2015 Final Power Integrated Resource Plan (IRP) in December 2015, which provides a 20-year framework to ensure LADWP will meet the future energy needs of its ratepayers by forecasting demand for energy and determining how that demand will be met. The IRP is an update of the 2014 IRP, and reflects evolving environmental, regulatory, and economic developments. Major changes from the 2014 IRP include a newly created and redesigned energy efficiency (EE) program to achieve at least 10 percent less customer usage of electricity by 2020; efforts underway to expand upon the existing Power Reliability Program (PRP) by developing a new Power System Reliability Program (PSRP) to incorporate not only distribution, but also generation, transmission, and substations with a new prioritization model to improve system reliability; and plans for an agreement between Intermountain Power Agency and the Intermountain Power Project (IPP) participants to replace IPP coal-fired generation with new highly efficient gas-fired generators by no later than July 1, 2025, two years earlier than recommended in 2012's IRP.

This 2015 IRP incorporates updates to reflect the latest load forecast, fuel price and projected renewable price forecasts, and other modeling assumptions. Major renewable projects approved or implemented include the approval of 460 megawatt (MW) of large scale solar, approval of the 250 MW Beacon Solar Project, implementation of Pine Tree and Adelanto Solar, and implementation of two geothermal projects. An innovative Solar Feed-in-Tariff (FiT) Program was implemented by the Department of Energy, which consists of a FiT 100 – Set Pricing Program and a FiT 50 – Competitive Pricing Program, which bundles Beacon Solar and Local Solar. The Fit 50 - Competitive Pricing Program is an innovative program that combines both a FiT local solar agreement committing to a large block of approximately 10 MW, together with a commitment to a large utility scale project of approximately 50 MW to be built by the same vendor at LADWP's Beacon Solar site.[217] This IRP considers a 20-year planning horizon to guide

[216] *2015 Final Power IRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afrLoop=399494189004579.*

LADWP as it executes major new and replacement projects and programs. The overriding purpose is to provide a framework to assure the future energy needs of LADWP customers are met in a manner that balances the following key objectives: superior reliability and supply of electric service; competitive electric rates consistent with sound business principles; and responsible environmental stewardship exceeding all regulatory obligations.[218]

Los Angeles Department of Water and Power

Electricity

The LADWP supplies more than 26 million megawatt hours (mw-h) of electricity a year for the City of Los Angeles' 1.4 million customers.[219] The utility was established more than 100 years ago to provide water and electric needs to the City's businesses and residents. LADWP serves a 465-square-mile area and is the largest municipal utility in the nation. In total, LADWP operates 20 receiving stations and 174 distribution stations to provide electricity to LADWP customers, with additional facilities to be acquired as their load increases. The power supply sources include: 39 percent from coal, 22 percent from natural gas, three percent from large hydroelectric, 11 percent from nuclear, five percent from unspecified sources, and 20 percent from renewables which include small hydroelectric, solar, wind, geothermal, biomass, and waste.[220] Under the City Charter, LADWP has an obligation to serve the citizens of the City.[221]

Table 3.18.4 – LADWP Electricity Capacity shows the LADWP electricity system capacity and *Table 3.18-5 – LADWP Energy Usage* shows the LADWP power usage. *Table 3.18-6 – Energy Sales and Peak Demand* provides the estimated sales (consumption) by sector (residential, commercial, industrial, etc.) and peak demand over the next 10 years.

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[218] *LADWP, 2015 IRP, pg ES-1: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afrLoop=399494189004579.*

[219] *LADWP, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=na2o8wvza_4&_afrLoop=81976737428000, April 8, 2016.*

[220] *LADWP, Power Facts and Figures website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=scgxlug8o_21&_afrLoop=82063279159000&_afrWindowMode=0&_afrWindowId=na2o8wvza_1#%40%3F_afrWindowId%3Dna2o8wvza_1%26_afrLoop%3D82063279159000%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dna2o8wvza_33, April 8, 2016.*

[221] *LADWP Reliability Study, December 31, 2010, pg. i: http://www.swrcb.ca.gov/water_issues/programs/ocean/cwa316/saccwis/docs/sa_ladwp_2011reliability.pdf.*

Table 3.18-4
LADWP Electricity Capacity

	Amount (megawatts)
Net Maximum Plant Capacity	7,300
Los Angeles Peak Demand	6,177

Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afrLoop=1119458526572567
Table: CAJA Environmental Services, February 2017.

Table 3.18-5
LADWP Energy Usage

	Amount (megawatt-hours)
Residential	8.4
Commercial	12.8
Industrial	1.9
Other	0.4
Total	**23.14**

Fiscal Year 2013. Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afrLoop=1119458526572567.
Table: CAJA Environmental Services, February 2017.

Table 3.18-6
Energy Sales and Peak Demand

Year	Sector Sales (gw-h)						Peak Demand (mw)
	Residential	Commercial	Industrial	Misc.	PHEV	Total	
2016-17	8,206	12,760	1,985	455	224	26,878	6,721
2017-18	8,215	12,586	1,989	457	270	26,714	5,671
2018-19	8,242	12,413	1,994	458	350	26,638	5,650
2019-20	8,279	12,251	1,997	460	429	26,695	5,634
2024-25	8,710	13,230	1,994	469	834	28,649	5,991

gw-h – gigawatt-hours; mw – megawatts
Misc. includes streetlighting, Owens Valley, and intra-departmental
LADWP, 2015 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afrLoop=399494189004579
Table: CAJA Environmental Services February 2017.

Power and Energy

When discussing electricity, the appropriate unit of measurement depends on whether one is referring to power or energy. Power is the rate at which energy is consumed (in watts, kilowatts [kW], or MW). Energy is the amount of power consumed (in watt-hours). Customers are charged based on their energy use (typically kW-hours [kW-h]). The relationship between power and energy:

- Energy (watt-hours) = power (watts) X time (hours)

For example, a 60-watt light bulb refers to the amount of power the light consumes. If the 60-watt light bulb was on for 12 hours, it would consume 720 watt-hours (or 0.72 kW-h) of energy.

Load Factor

Load factor represents how consistent the rate of energy usage throughout a given day. A 100 percent load factor means that the same amount of power is used off peak as on peak, so the system is getting full use of its generating resources. A low load factor results in generators being started more often to serve load for a few hours a day, which is not optimum. From the 1990s through 2005, annual system load factors were trending slowly upward, which is a positive movement. Since 2006, system load factors are trending down. Some of this decline in load factor is due to the fact that much of the historic energy efficiency effort is directed at lighting, which has a higher impact on sales when compared to peak. In the forecast for the future, this downward trend is sustained.[222]

Load factor can be expressed as the ratio of the average load in kW supplied at a designated period compared to the peak or maximum load in kW occurring in the period. Load factor, in percent, is derived by multiplying the kW-h in the period by 100 and dividing by the product of the maximum demand in kilowatts and the number of hours in the period:[223]

- Load Factor (%) = (kW-h / hours / kW) X 100%

- Example: Assume a 30-day billing period or 30 days X 24 hours for a total of 720 hours. Assume a customer used 10,000 kW-h and had a maximum demand of 21 kW. The customer's load factor would be 66 percent [(10,000 kW-h / 720 hours / 21 kW)*100].

Natural Gas Supply and Demand

SCG, a subsidiary of Sempra Energy and the nation's largest natural gas supplier, distributes natural gas to 19.5 million residential, commercial, and industrial customers throughout the southern half of California. SCG owns and operates 95,000 miles of gas distribution mains and service lines, as well as

[222] *LADWP, 2014 IRP, pg 47: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=q463ohn9x_17&_afrLoop=1251830725757441.*

[223] *Madison Gas and Electric, Glossary for Load Factor: http://www.mge.com/about/electric/glossary.htm#f, April 11, 2016.*

nearly 3,000 miles of transmission and storage pipeline. The utility also owns gas transmission compressor stations and underground storage facilities. The total 136.1 billion cubic feet (Bcf) of natural gas storage capacity is divided as follows: 82 Bcf is for core customers, small industrial, and commercial customers; 4 Bcf is for system balancing; and the remaining 49.1 Bcf is available to other customers.[224] Natural gas service is provided in accordance with SCG's policies and extension rules on file with the (PUC) at the time contractual agreements are made.

> The State produces about 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the State, 62 percent from the Southwest and Rocky Mountain area, and 23 percent from Canada. In the last 10 years, three new interstate gas pipelines were built to serve California, expanding the over one million miles of existing pipelines. However, the availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SCG is under the jurisdiction of the PUC, but can be affected by the actions of federal regulatory agencies. Should these agencies take any action affecting natural gas supply or the conditions under which service is available, natural gas service would be provided in accordance with those revised conditions.

The 2016 California Gas Report includes projections regarding future demand for natural gas in the Southern California region. SCG projects total gas demand to decline at an annual rate of 0.6 percent from 2016 to 2035. The decline in throughput demand is due to modest economic growth, PUC-mandated EE standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). From 2016 to 2035, residential demand is expected to decline from 239 Bcf to 218 Bcf. The decline is due to declining use per meter offsetting new meter growth. The core, non-residential markets are expected to grow from 113 Bcf in 2016 to 105 Bcf by 2035. The change reflects an annual growth rate of 0.5 percent over the forecast period. The noncore, non-electric generation (EG) markets are expected to decline from 170 Bcf in 2016 to 153 Bcf by 2035. The annual rate of decline is approximately 0.5 percent due to very aggressive energy efficiency goals and associated programs. On the other hand, utility gas demand for enhanced oil recovery (EOR) steaming operations, which had declined since the Federal Energy Regulatory Commission (FERC)-regulated Kern/Mojave interstate pipeline began offering direct service to California customers in 1992, has shown some growth in recent years because of continuing high oil prices and is expected to show further growth in the early years of the forecast period. EOR demand is expected to remain at about its 2015 level through 2035 as gains are offset by the depletion of older oil fields.[225]

In 2016 gas demand for California is projected to average 6,072 million cubic feet per day (cf/day) and is projected to decrease to 4,626 million cf/day by 2035, a decline of 1.35 percent per year.[226] *Table 3.18-7 – Statewide Total Supplies and Requirements* shows the anticipated statewide total supplies and requirements for natural gas for 2014 to 2030. In 2014 (the latest data available from the 2014 California

[224] *2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, February 6, 2017.*

[225] *2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, February 6, 2017.*

[226] *2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, February 6, 2017.*

Gas Report), SCG's highest winter sendout was 4,881 million cf/day and highest summer sendout was 3,393 million cf/day.[227]

Table 3.18-7
Statewide Total Supplies and Requirements

	2016	2018	2020	2025	2030
Utility Supply Source					
California Sources	165	165	165	165	165
Out-of-State	5,060	4,758	4,668	4,599	4,489
Non-Utility Served Load	1,132	985	813	547	258
Statewide Supply Source Total	**6,358**	**5,909**	**5,645**	**5,312**	**4,912**
Utility Requirements					
Residential	1,181	1,185	1,155	1,114	1,076
Commercial	484	481	473	454	443
Natural Gas Vehicles	46	50	54	66	85
Industrial	964	943	932	930	938
Electric Generation	1,897	1,623	1,566	1,548	1,453
Enhanced Oil Recovery Steaming	46	46	46	46	46
Wholesale/International Exchange	241	246	247	247	256
Company Use and Unaccounted-For	79	74	73	72	71
Non-Utility Served Load	1,132	985	813	547	258
Statewide Requirements Total	**6,072**	**5,623**	**5,360**	**5,026**	**4,626**

All measurements in million cf per day. Numbers in the table may not add up exactly due to rounding. Average temperature and normal hydro year.
2016 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, August 31, 2016.
Table: CAJA Environmental Services February 2017.

The SCG demands for 2015 and 2035 are shown in *Table 3.18-8*. Demand is expected to be relatively flat (commercial) or exhibit annual declines (residential, industrial) due to modest economic growth, PUC-mandated demand-side management goals and renewable electricity goals, decline in commercial and industrial demand, and continued increased use of non-utility pipeline systems by EOR customers and savings linked to advanced metering modules.[228]

Table 3.18-8
SCG Natural Gas Demands

[227] *2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, February 6, 2017.*

[228] *2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, February 6, 2017.*

	2015	2035	Difference
Residential	239	218	-21
Core Commercial	81	65	-16
Non-Core Commercial	16.4	14.7	-1.7
Industrial	21.6	15.3	-6.3
All measurements in billion cf *2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, August 31, 2016.* *Table: CAJA Environmental Services February 2017.*			

ENVIRONMENTAL IMPACTS

Thresholds of Significance

State CEQA Guidelines

Appendix F, Energy Conservation, of the CEQA Guidelines directs an EIR to include the following:

(a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed;

(b) The effects of the project on local and regional energy supplies and on requirements for additional capacity;

(c) The effects of the project on peak and base period demands for electricity and other forms of energy;

(d) The degree to which the project complies with existing energy standards;

(e) The effects of the project on energy resources; and

(f) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

City of Los Angeles CEQA Thresholds Guide

As set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;

- Whether and when the needed infrastructure was anticipated by adopted plans; and

- The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

Based on these factors a project would have a significant impact if:

- The project would result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities; or

- The design of the project fails to incorporate energy conservation measures that go beyond existing requirements.

Methodology

The SCAQMD has electricity[229] and natural gas[230] consumption rates for various land uses based on the square footage of development. Applying the SCAQMD rates to the proposed building square footages and use types, an estimate was made as to the future demand for the Project. Given the existing capacity of the Project Site's electrical and natural gas delivery system and future projected consumption and demand, an assessment was made of the Project's impacts. Appendix F of the CEQA Guidelines further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives. In accordance with Appendix F of the CEQA Guidelines, this includes relevant information and analyses that address the energy implications of the Project. This section represents a summary of the Project's anticipated energy needs, impacts, and conservation measures.

Project Impacts

Construction

Fuel Calculation

Heavy-duty construction equipment associated with construction activities would include diesel-fueled haul trucks, excavators, skid steer loaders, tractors, and water trucks. Heavy-duty construction equipment associated with building construction would include air compressors, concrete pumps, forklifts, lifts, and welders. Heavy-duty construction equipment associated with outdoor hardscape and landscaping would include air compressors, backhoes, dozers, forklifts, lifts, loaders, and rollers. The equipment would be in compliance with the regulations required in the Air Quality and Noise sections of this IS/MND. Construction equipment fuels (diesel, gas, or natural gas) would be provided by local or regional suppliers and vendors. The transportation fuel required by construction workers would depend on the total number

[229] *SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-11-A, Electricity Usage Rate.*

[230] *SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate.*

of worker trips estimated for the duration of construction activity. A study by Caltrans found that the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) is projected at 22.711 miles per gallon (mpg) and worse-case diesel trucks is 6.178 mpg in 2015.[231]

During Project construction, energy would be consumed in three general forms: (1) petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, as well as delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities); (2) electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance), and electricity associated with providing temporary power for lighting and electronic equipment inside temporary construction trailers and within the proposed structures; and (3) energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

The petroleum-based fuel use summary represents a conservative estimate of energy that would be consumed throughout the Project construction period based on maximum intensity construction assumptions. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. In addition, construction activities would be subject to compliance with applicable regulatory requirements designed to reduce the consumption of energy resources. Specifically, regulatory requirements would require idling of all diesel-fueled commercial vehicles weighing over 10,000 pounds during construction to be limited to five minutes at any location. Compliance with this measure would reduce the Project's reliance on petroleum-based fuels during construction activities and the Project's consumption of petroleum-based fuels would not have an adverse impact on available supplies. In addition, with regard to trips for hauling demolition materials, the City of Los Angeles has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. The project's compliance with these regulations would reduce the number of trips and fuel required to transport construction debris, which would reduce the wasteful, inefficient, and unnecessary consumption of energy, and provide for reduced transportation-related energy usage compared to similar projects in other jurisdictions.

In 2012, California consumed a total of 337,666 thousand barrels of gasoline for transportation, which is equivalent to a total annual consumption of 14.1 billion gallons by the transportation sector.[232] Construction of the Project would represent 0.001 percent of the statewide gasoline consumption and 0.001 percent of the statewide diesel consumption. The expected construction gasoline and diesel fuel gas for the Project would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors. Therefore, gas impacts during construction would be less than significant.

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231 *Caltrans, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF.*

232 *US EPA, State Energy Data System, Table F-3: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf.*

Electricity Demand

Electricity would be consumed during the conveyance of the water used during construction activities that require the use of water to control fugitive dust. Furthermore, electricity used to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structures. This electricity would be supplied to the Project Site by LADWP and would be obtained from the existing electrical lines that connect to the Project Site. Similar to the use of petroleum-based fuels, electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.

Construction of the Project's electrical infrastructure would occur entirely within the Project Site with the possible need for off-site connections to facilities adjacent to the Project Site. As such, construction of the Project's electrical infrastructure is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses, utility system capacity, or existing electrical infrastructure. The Project's on-site electrical system would consist of underground electrical lines, conduits, banks, and transformers, as needed. Where feasible, the new service installations and connections would be scheduled and implemented in a manner that would not result in electrical service interruptions to other properties. Compliance with LADWP's guidelines and requirements would ensure that the Project Applicant fulfills its responsibilities relative to infrastructure installation, coordinates any electrical infrastructure removals or relocations with LADWP, and limits any impacts associated with grading, construction, and development within LADWP easements.

While it is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete, it is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. In addition, the Project would feature a sustainable design to comply with CALGreen, which would also result in the use of sustainable materials and recycled content that would reduce energy consumption during Project construction. Thus, as compared to a similar project that utilizes more conventional materials, the Project would result in reduced indirect energy usage related to construction material production.

Therefore, the Project's on-site construction activities would not result in the wasteful, inefficient, or unnecessary use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. Furthermore, Project construction would not violate state or federal energy standards or consume a substantially greater amount of energy than other similar projects. As such, impacts would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))[233] to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated.

Operation

Electricity Demand

Electrical conduits, wiring and associated infrastructure would be conveyed to the Project from existing LADWP lines in the surrounding streets to the Project during construction. The Project would likely require transformer vaults, which are common for buildings of its size. However, the construction of these vaults is part of the overall building construction and would not constitute unusual or unplanned infrastructure that would cause a significant impact on the environment. The LADWP forecasts that in 2018-19, the total adjusted electricity sales (load forecast) will be 26,638 gigawatt-hours (gw-h) with residential uses consisting 8.242 gw-h and commercial uses consisting of 12.413 gw-h. The peak demand would be 5,650 megawatts (mw).[234]

As shown in *Table 3.18-9 – Project Estimated Electricity Demand*, the Project would demand approximately 955,178 kW-h/year (0.955 gw-h/year) of electricity. This total represents a more

[233] *California Air Resources Board, Final Regulation Order, Amendments to the Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants from In-Use On-Road Diesel-Fueled Vehicles, http://www.arb.ca.gov/msprog/onrdiesel/documents/tbfinalreg.pdf.*

[234] *LADWP, 2014 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=9kjcyeafd_4&_afrLoop=1178238919540287.*

conservative result since it does not take any credit for the existing uses that would be removed (under the Original Baseline and Current Baseline). It also does not take any credit for the proposed sustainable and energy conservation features of the Project. [235]

Table 3.18-9
Project Estimated Electricity Demand

Land Use	Size	Electricity Rates	Total (kw-h/yr)
Project			
Hotel	55,000 sf	9.95 kw-h / sf	547,250
Restaurant and Bar	8,597 sf	47.45 kw-h / sf	407,928
		Total	**955,178**

sf =square feet; kw-h = kilowatt-hour; yr = year
Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate
The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
Table: CAJA Environmental Services, April 2017.

The Project's annual electricity consumption would represent approximately 0.003 percent of the forecasted electricity demand in 2019-20.[236] Thus, the Project is within the anticipated demand of the LADWP system. The LADWP is able to supply 7,300 MW of power with a current peak of 6,177 MW. Thus, there is 1,055 MW of additional power capacity. To put this into perspective, this represents approximately 0.002 percent of the additional power capacity at existing levels. Peak demand is expected to grow to 5,650 MW in 2018-2019 and 5,899 MW in 2023-2024.[237] Despite these growth projections, they would still not exceed the existing capacity of 7,300 MW. Thus, there is adequate supply capacity to serve the Project. Therefore, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption. The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The Project would be in compliance with CALGreen requiring building energy efficiency standards, and would also be in compliance with the LAGBC. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[238] It should also be noted that the Project's estimated electricity consumption is based on usage rates that do not account for the Project's energy conservation

[235] *Tao restaurant electricity demand was calculated in the Adopted MND and are not included as part of the Project.*

[236] *0.955 / 26,638 x 100% = 0.04%*

[237] *2015 Power Integrated Resource Plan, Table A-1, Forecasted growth in Annual Peak Demand: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afrLoop=399494189004579*

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

features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the Project would likely be lower than that forecasted. Based on the above analysis, no operational impacts associated with the consumption of electricity will occur.

Natural Gas Demand

As shown in *Table 3.18-10 – Project Estimated Natural Gas Demand*, the Project is estimated to demand approximately a net decrease of 288,931 cf/month (or 9,631 cf/mo) of natural gas. The total was reduced by the demand of the existing uses, which would be removed. The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the Project's energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2016 is estimated at 2,947 million cf/day and 2022 is estimated at 2,849 million cf/day. The Project's increase (not counting the existing use removal) of 9,631 cf/day represents approximately 0.0003 percent of the 2022 peak demand. Thus, there is adequate supply capacity and no impacts will occur. The following mains exist on streets surrounding the Project Site:[239]

- 3" diameter distribution main on Selma Avenue; and
- 3" diameter distribution main on Wilcox Avenue.

The Project can be served from any of these mains. The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SCG undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements.[240] The Project would not result in the construction of natural gas facilities (i.e., natural gas distribution lines) that would cause significant environmental impacts. As such, no impacts on natural gas infrastructure as a result of the Project will occur. [241]

Table 3.18-10
Project Estimated Natural Gas Demand

Land Use	Size	Natural Gas Rates	Total (cf/mo)
Project			
Hotel	55,000 sf	4.8 cf/mo	264,000

[239] *Correspondence from SCG, May 18, 2016.*

[240] *Correspondence from SCG, May 18, 2016.*

[241] *Tao restaurant natural gas demand was calculated in the Adopted MND and are not included as part of the Project.*

Table 3.18-10
Project Estimated Natural Gas Demand

Land Use	Size	Natural Gas Rates	Total (cf/mo)
Restaurant and Bar	8,597 sf	2.9 cf/mo	24,931
		Total	**288,931**

sf =square feet; cf = cubic feet; mo = month
Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate
The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
Table: CAJA Environmental Services, April 2017.

Regulatory compliance for building efficiency would help alleviate natural gas demand. In 2015, the state anticipated a surplus difference of 179 million cf of gas between the supply and demand requirements. Therefore, it is anticipated that adequate supplies exist to accommodate the Project's demand for natural gas. Even if this were not the case, SCG would make the adequate changes in order to provide the load to the customer, as SCG has an obligation to serve projects in its service area. Overall, the Project would not require the acquisition of additional natural gas resources beyond those that are anticipated by SCG.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Ordinance and would thus exceed the standards in Title 24 of the California Code of Regulations requiring building energy efficiency standards. Therefore, because of energy efficient design features, compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the three sites, Project impacts related to natural gas will be less than significant.

Transportation Energy Consumption

The Project's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. A number of Metro bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site. As such, the Project Site is located in proximity to numerous Metro bus routes, thereby providing access for employees, patrons, and residents of the Project Site. These services provide an alternative to driving individual vehicles both into the Project Site from the surrounding areas as well as for residents, guests, and visitors at the Project Site to travel to surrounding areas. The increases in land use diversity and mix of uses on the Project Sites would reduce vehicle trips and vehicle miles travelled by encouraging walking, bicycling, and other nonautomotive forms of transportation, which would result in corresponding reductions in energy demand. Regarding bicycling, the Project would provide bicycle parking spaces at least to the City's Bicycle Parking Ordinance.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on the Project's estimated VMT, this would represent less than 0.0001 percent of the statewide gasoline consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Site would reduce the Project's consumption of gasoline and diesel. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

Alternative Energy Discussion

The use of energy provided by alternative (i.e., renewable) resources, off-site and on-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by LADWP, the service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation. LADWP is required to commit to the use of renewable energy sources for compliance with the California Renewable Energy Resources Act, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 RPS to include biodiesel; biomass; hydroelectric and small hydro (30 MW or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and "other renewables that may be defined later".[242]

LADWP's target procurement of energy from renewable resources in 2014 is 20 percent. As of 2011, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet Project demand. With respect to on-site renewable energy sources, because of the Project's location, there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydro, digester gas, fuel cells, landfill gas, municipal solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Geothermal energy, the use of heat naturally present in shallow soil or in groundwater or rock to provide building heating/cooling and to heat water, requires the installation of a heat exchanger consisting of a network of below-ground pipes to convey heated or cooled air to a building. Although methane is a renewable derived biogas, it is not available on the Project Site in commercially viable quantities or form (i.e., a form that could be used without further treatment), and its extraction and treatment for energy purposes would result in secondary impacts; it is currently regulated as a hazardous material by the City through its Methane Code.

[242] *City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.*

The LAGBC discusses renewable energy (Section 99.04.211):

99.04.211.4. Solar Ready Buildings. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid after the effective date of the 2013 California Energy Code (Title 24, Part 6) shall comply with the following:

> 1. All one- and two-family dwellings, shall comply with Section 110.10(b)1A, 110.10(b)2, 110.10(b)3, 110.10(b)4, 110.10(c), 110.10(d) and 110.10(e) of the California Energy Code (Title 24, Part 6).
>
> 2. All buildings, other than one- and two-family dwellings, shall comply with Section 110.10(b) through 110.10(d) of the California Energy Code (Title 24, Part 6).

99.04.211.5. Space for Future Electrical Solar System Installation. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid prior to the effective date of the 2013 California Energy Code (Title 24, Part 6), shall provide a minimum of 250 square feet of contiguous unobstructed roof area for the installation of future solar photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Finally, solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant. Wind-powered energy is not viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin. The California Energy Commission (CEC) studied the State's high wind resource potential.[243] Based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County. Additionally, there are no viable sites within the Project Site for placement and operation of a wind turbine. The CEC has identified areas within the State with high potential for viable solar, wind, and geothermal energy production. The CEC rated California's solar potential by county using insolation values available to typical photovoltaic system configurations, as provided by the National Renewable Energy Laboratory. Although Los Angeles as a County has a relatively high photovoltaic potential of 3,912,346 megawatt-hours (MWh)/day, inland counties such as Inyo (10,047,177 MWh/day), Riverside (7,811,694 MWh/day), and San Bernardino (25,338,276 MWh/day) are more suitable for large-scale solar power generation.[244] In addition, most of the high potential areas of greater than 6 kWh/sqm/day in Los Angeles County are concentrated in the northeastern corner of the county around Lancaster, approximately 45 miles away from the Project Site.

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[243] *California Energy Commission. California Wind Resource Potential, http://www.energy.ca.gov/maps/renewable/Wind_Potential.pdf.*

[244] *California Energy Commission, California Solar Resources, April 2005, http://www.energy.ca.gov/2005publications/CEC-500-2005-072/CEC-500-2005-072-D.PDF.*

The Project shall implement all applicable mandatory measures within the LAGBC that would have the effect of reducing the Project's energy use.

The Project shall comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria.

The Project shall comply with the lighting power requirements in the California Energy Code, California Code of Regulations, Title 24, Part 6.

19. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues. The Project Site is located in an urbanized area of the City. There are no street trees on the City sidewalk around the Project Site. There is no ornamental plants or sidewalk grass strips around the Project Site. The Project would have no impact to historic resources. The Project will have a less than significant impact on archeological resources, paleontological resources, and human remains, with implementation of required regulatory compliance. 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 Traffic Study (Appendix J-1 to this MND) provides a list and map of the Related Projects used for these analyses. All the 136 related projects are in the City, except for Nos. 4, 6, and 117, which are in the City of West Hollywood. The related projects include a variety of land uses, including approximately:

- 9,038 residential units (apartments, condominiums, student and faculty/staff housing, live/work)
- 115,491 square feet of health club
- 4,159,756 square feet of office (various types)
- 350 students facilities
- 1,096,775 square feet of retail
- 1,904 hotel rooms
- 137,211 square feet of restaurant
- 28,483 square feet of bar/lounge, special event and banquet space
- 27,390 square feet of storage, studio sound stage, and stage support space

The nearest related projects to the Project Site are:

- No. 2 – 1600 Schrader, approximately 300 feet from the Project Site, would have 168 hotel rooms and 4,000 square feet of restaurant
- No. 5 – 6516 Selma Avenue, approximately 100 feet from the Project Site, would have 212 hotel rooms, 2,308 square feet, 11,148 square feet restaurant/bar.
- No. 33 – 6417 Selma Avenue, adjacent to the Project Site, would have 180 hotel rooms. This Project finished construction and is expected to open in summer 2017.
- No. 93 – 1525 Cahuenga Boulevard, approximately 350 feet from the Project Site, would have 69 hotel rooms, 1,500 square feet office.

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. 33 finished and ready for opening. As such, it has already been subject to CEQA analysis with mitigation measures to reduce impacts. Related Project No. 5 would be located across Wilcox Avenue and has existing intervening buildings between it and the Site. Related Project No. 93 is further away from the Site than several analyzed sensitive receptors. The other related projects have several intervening buildings and major roadways/freeway in between, and are at least 2 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 the City. With respect to aesthetics and views, and shade and shadow impacts, none of the related projects are located in proximity to the Project Site such that their development would affect the aesthetic character of the site or its immediate surroundings. There are no scenic or protected views in the area, and the view corridor along Cahuenga Boulevard is not unique or provides a distinct vantage point. Development of related projects is expected to occur in accordance with adopted plans and regulations. Therefore, cumulative aesthetic impacts will be less than significant and the Project would not make a cumulative considerable contribution to this less than significant impact.

Agriculture and Forestry Resources

Development of the Project in combination with the related projects would not result in the conversion of state-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact will occur.

Air Quality

AQMP Consistency

Cumulative development can affect implementation of the 2016 AQMP. The 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 AQMP will not be obstructed by such growth and cumulative impacts will be less than significant. The Project would contain a hotel and retail use. As such, the Project could not conflict with the growth assumptions in the regional air quality attainment plan and will be accommodated in the region's emissions inventory for the RTP/SCS and AQMP.

As discussed in the Air Quality and Utilities and Service Systems sections of this IS/MND, the Project is consistent with SCAG's growth projections which are based on macroeconomic data and socioeconomic variables independent of parcel-level land use designation and zoning. Therefore, the Project would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the AQMP will 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, these emissions associated with the Project would not be cumulatively considerable. Therefore, cumulative air quality impacts will be less than significant.

Odor Impacts

With respect to odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Project and related projects would not combine to create objectionable construction odors. With respect to operations, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the related projects and the Project's long-term operations phase. Thus, the Project would not make a cumulative considerable contribution to odor impacts and cumulative odor impacts will 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 CDFW 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 will 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 will be less than significant.

Greenhouse Gas Emissions

The Project emissions represent a reduction in CO_2e emissions from a NAT 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 will 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 will 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 LID Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage

systems will be less than significant. Therefore, cumulative water quality impacts will 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.[245] Therefore, cumulative land use impacts will be less than significant.

Furthermore, the Project would not make a cumulatively considerable contribution to a cumulatively significant land use inconsistency, and cumulative impacts will be less than significant. As reflected in the traffic study, there are 136 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, HCP or Industrial Land Use Policy. Finally, the City's threshold of significance analyzes inconsistency only with respect to policies adopted to mitigate or avoid environmental impacts. The City of West Hollywood related projects would be subject to the land use policies of that jurisdiction. Thus, a cumulative inconsistency cannot result in a finding of significance.

Mineral Resources

Development of the Project in combination with the related projects would not result in the loss of availability of mineral resources. The Project Site and the surrounding area are highly urbanized area and do not include any MRZ zones. Therefore, no cumulative impact will 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. Construction-period noise for the Project and each related project (that has not yet been built) would be localized in nature. None of the related projects are in close enough proximity to the Project Site to cause cumulative construction or stationary noise or vibration impacts. Any construction noise from related projects, were it to occur concurrently with the Project, would be attenuated by the distance across Wilcox Avenue and Cahuenga Boulevard. In addition, each of the related projects would be required to comply with the City's Noise Ordinance, as well as implement any mitigation measures that may be prescribed pursuant to CEQA. With respect to cumulative traffic noise impacts, it should be noted that the Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Project Traffic Impact Study. Based on the Project's estimated trip generation, the Project plus future cumulative baseline conditions would 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 will be less than significant.

[245] *Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/index01.cfm*

Population and Housing

The related projects would introduce additional residential, commercial/retail/restaurant, office, school, and other related uses to the City 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 9,308 residential dwelling units to the area, generating approximately 25,397 new residents (a conservative assumption). The Project would not have any residential units or add any population. The net increase of approximately 94 employees (worse-case under Current Baseline) is not cumulatively considerable as there are no thresholds for employee impacts. The Project would not displace any residents. The City is expected to increase its direct population by approximately 578,496 persons from 2016-2040 according to SCAG. This would ensure that the land uses changes (including density increases) will be accommodated in the region's inventory for the RTP/SCS. The Project and related projects would not exceed this projection. The Project would not make a cumulative considerable contribution and cumulative impacts to population and housing will be less than significant.

Public Services

Fire

The related projects in the City of West Hollywood would be served by the LAFD through Station No. 7 and No. 8. The Project, in combination with the related projects, could increase the demand for fire protection services in the Project Site 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 would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the development on any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. The LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to fire protection services impacts, and, as such cumulative impacts on fire protection will be less than significant.

Police

The related projects in West Hollywood would be served by the Los Angeles County Sheriff's Department, through the West Hollywood Station. The Project, in combination with the related projects, would increase the demand for police protection services in the Project Site 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 in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development on any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. The LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to police protection services impacts, and cumulative impacts on police protection will 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 9,038 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 350 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. The Project would not make a cumulative considerable contribution and cumulative impacts on schools will 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 Act (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 will be less than significant.

Library

The related projects in West Hollywood would be served by the Los Angeles County Public Library, through the West Hollywood Branch. Development of the related projects would likely generate additional demands upon library services. However, there are no planned expansions or new libraries by the LAPL (as cited by the LAPL response letter, included in the appendices) that would be considered a significant impact. Therefore, the cumulative impacts related to library facilities will 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 with Project" scenario). This cumulative future includes the related projects. The future (2020) with Project analysis shows no significant impact to any of the study intersections (with mitigation) or CMP intersections or freeways. This is directly analyzed in the traffic section above. Therefore, the Project's cumulative impact is considered less than significant.

Tribal Cultural Resources

Impacts to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The analysis of the Project's impacts to tribal 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 will be less than significant.

Utilities and Service Systems

Development of the Project, in conjunction with cumulative growth throughout the City (including the related projects), would further increase the generation of wastewater, demand for potable water within the City, and increase regional demands on landfill capacity.

Wastewater

As shown on *Table 3.19-1 – Cumulative Estimated Wastewater Generation*, it is estimated the related projects will generate a net total of approximately 2,300,185 gpd (or 2.3 mgd) of wastewater. The Project represents one percent of the cumulative total. The HTP has adequate capacity (88 mgd) to accommodate the cumulative total. The Project would not make a cumulative considerable contribution and a less than significant cumulative impact will occur.

Table 3.19-1
Cumulative Estimated Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Residential	9,038 units	150 gallons / unit	1,355,700
Health Club	115,491 sf	650 gallons / 1,000 sf	75,069
Office	4,159,756 sf	120 gallons / 1,000 sf	499,171
School	350 students	11 gallons / student	3,850
Retail	1,096,775 sf	50 gallons / 1,000 sf	54,839
Hotel	1,904 rooms	120 gallons / room	228,480
Restaurant	137,211 sf	300 gallons / 1,000 sf	41,163
Bar/Lounge	28,483 sf	720 gallons / 1,000 sf	20,508
Storage	27,390 sf	30 gallons /1,000 sf	822
		Related Projects	**2,279,602**
		Proposed Project	**20,583**
		Cumulative (Related + Project)	**2,300,185**

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, April 2017.

Water

As shown on *Table 3.19-2 – Cumulative Estimated Water Demand*, it is estimated the related projects and the Project will demand a net total of approximately 2,808,568 gpd (or 2.8 mgd) of water. The Project represents one percent of the cumulative total. LADWP's 2015 Urban Water Management Plan was adopted in June 2016 and projects a total demand of 611,800 AFY in 2020 and 644,700,000 AFY in 2025.[246] The cumulative total is approximately 3,146 AFY, which is within the supply of the UWMP and accommodated by any project that conforms to the General Plan and zoning. Related projects that do not would be required to demonstrate that there is adequate supply, through a Water Supply Assessment for example. The LAAFP has adequate capacity (between 50 and 150 mgd, during summer and non-summer

[246] *2015 Urban Water Management Plan, Los Angeles, pg. ES-23.*

months, respectively) to accommodate the cumulative total. The Project would not make a cumulative considerable contribution and a less than significant cumulative impact will occur.

Table 3.19-2
Cumulative Estimated Water Demand

Land Use	Size	Water Demand Rates	Total (gpd)
Residential	9,038 units	177 gallons / unit	1,599,726
Health Club	115,491 sf	832 gallons / 1,000 sf	96,089
Office	4,159,756 sf	153.6 gallons / 1,000 sf	638,939
School	350 students	14 gallons / student	4,900
Retail	1,096,775 sf	64 gallons / 1,000 sf	70,194
Hotel	1,904 rooms	153.6 gallons / room	292,454
Restaurant	137,211 sf	384 gallons / 1,000 sf	52,689
Bar/Lounge	28,483 sf	922 gallons / 1,000 sf	26,261
Storage	27,390 sf	38 gallons /1,000 sf	1,041
		Related Projects	**2,782,293**
		Proposed Project	**26,275**
		Cumulative (Related + Project)	**2,808,568**

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, April 2017.

Solid Waste

As shown on *Table 3.19-3 – Cumulative Estimated Solid Waste Generation*, it is estimated the related projects and the Project will generate a net total of approximately 154,380 pounds per day of solid waste (or 77 tons). The Project represents approximately 1 percent of the cumulative total. The Sunshine Canyon landfill has adequate capacity (and currently accepts 9,000 tpd on weekdays and 3,000 tpd on Saturday) to accommodate the cumulative total. The Project would not make a cumulative considerable contribution and a less than significant cumulative impact will occur

Table 3.19-3
Cumulative Estimated Solid Waste Generation

Land Use	Size	Solid Waste Rates	Total (pounds)
Residential	9,038 units	12.23 pounds / unit	110,535
Health Club	115,491 sf	31.2 pounds / 1,000 sf	3,603
Office	4,159,756 sf	6 pounds / 1,000 sf	24,959
School	350 students	0.5 pounds / student	175
Retail	1,096,775 sf	5 pounds / 1,000 sf	5,484
Hotel	1,904 rooms	4 pounds / room	7,616
Restaurant	137,211 sf	5 pounds / 1,000 sf	686
Bar/Lounge	28,483 sf	5 pounds / 1,000 sf	142
Storage	27,390 sf	5 pounds / 1,000 sf	137
		Related Projects	**153,337**
		Proposed Project	**1,043**
		Cumulative (Related + Project)	**154,380**

Note: sf = square feet
Rates: CalRecycle Estimated Solid Waste Generation Rates: http://www.calrecycle.ca.gov/wastechar/wastegenrates/
Table: CAJA Environmental Services, April 2017.

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the UWMP, 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 will be less than significant with implementation of provided mitigation measures (where applicable). These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the related projects in the City. In addition, several of the related projects would be subject to SB 610, which requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand. Ultimately, the wastewater and water facilities (HTP and LAAFP) and the Puente Hills MRF, Sunshine Canyon landfill, and Mesquite landfill have adequate capacity to accommodate the project and related projects. The Project's contribution to cumulative wastewater, water, and solid waste impacts will not be cumulatively considerable and cumulative impacts will be less than significant.

Electricity

The related projects are served by LADWP, same as the Project Site, and thus are counted as part of cumulative analysis. Given that the Project includes 114 rooms and the related projects include 1,904

hotel rooms, the Project's contribution to the cumulative electrical demand would not be cumulatively considerable or significant, representing less than 10 percent of the total amount of increase. As shown in *Table 3.19-4 – Cumulative Estimated Electricity Demand*, the cumulative projects would demand approximately 138 million kW-h/year (138 gw-h/year) of electricity. Peak demand is expected to grow to 5,650 mw in 2018-2019 and 5,899 mw in 2023-2024.[247] Thus, there is adequate supply capacity to serve the cumulative projects. Thus, the cumulative projects are within the anticipated demand of the LADWP system. In other words, there is adequate energy capacity to service the Project and the related projects. Each of the related projects would be evaluated within its own context with consideration of energy conservation features that could alleviate electrical demand. Each related project would be required to be in compliance with CALGreen requiring building energy efficiency standards, and would also be in compliance with the LAGBC. Further, each related project would need to be consistent with how the LADWP serves each location with its existing distribution infrastructure. Therefore cumulative impacts will be less than significant.

Table 3.19-4
Cumulative Estimated Electricity Demand

Land Use	Size	Electricity Rates	Total (kw-h / yr)
Residential	9,038 units	5,626.5 kw-h / unit	50,852,307
Health Club	115,491 sf	12.95 kw-h / sf	1,495,608
Office	4,159,756 sf	12.95 kw-h / sf	53,868,840
School	350 students	10.50 kw-h / sf	349,125
Retail	1,096,775 sf	13.55 kw-h/sf	14,861,301
Hotel	1,904 rooms	9.95 kw-h / sf	7,577,920
Restaurant	137,211 sf	47.45 kw-h / sf	6,510,662
Bar/Lounge	28,483 sf	47.45 kw-h / sf	1,351,518
Storage	27,390 sf	4.35 kw-h/sf	119,147
		Related Projects	**136,986,428**
		Proposed Project	**955,178**
		Cumulative (Related + Project)	**137,941,606**

[247] *2015 Power Integrated Resource Plan, Table A-1, Forecasted growth in Annual Peak Demand: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afrLoop=399494189004579*

Table 3.19-4
Cumulative Estimated Electricity Demand

Land Use	Size	Electricity Rates	Total (kw-h / yr)
sf =square feet; kw-h = kilowatt-hour; yr = year *Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate* *The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.* *Hotel Rooms: average budget room is 300 to 400 square feet. http://www.dimensionsinfo.com/hotel-room-size/. This analysis assumes 400 square feet per room.* *School – 95 square feet per student: http://www.cde.ca.gov/ls/fa/sf/completesch.asp* *Table: CAJA Environmental Services, April 2017.*			

Natural Gas

All of the related projects are served by the same natural gas service as the Project (SCG). Given that the Project includes 114 rooms and the related projects include 1,904 hotel rooms, the Project's contribution to the cumulative natural gas demand would not be cumulatively considerable or significant, representing less than 10 percent of the total amount of increase. As such, the Project's contribution to the cumulative natural gas demand would not be substantial. Therefore, Project impacts to natural gas demand would not be cumulatively considerable or significant. These estimates do not account for energy reduction features employed by the Project or related projects. Each of the related projects would be evaluated within its own context with consideration of energy conservation features that could alleviate natural gas demand. Further, each related project would need to be consistent with the building energy efficiency requirements of Title 24 as well as how SCG serves each location with its existing distribution infrastructure.

As shown in *Table 3.19-5 – Cumulative Estimated Natural Gas Demand*, the cumulative projects are estimated to demand approximately a net increase of 56,435,781 cf/month of natural gas (1.9 million cf/day). The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the cumulative projects' energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2016 is estimated at 2,947 million cf/day and 2018 is estimated at 2,931 million cf/day.[248]. The increase of 1.0 million cf/day represents approximately 0.064 percent of the 2018 peak demand. Thus, there is adequate supply capacity and no impacts will occur.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource.

[248] *2016 CA Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf*

However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The related projects would be in compliance with the City's Green Building Ordinance and would thus exceed the standards in Title 24 of the California Cod of Regulations requiring building energy efficiency standards.

All forecasted growth would incorporate design features and energy conservation measures, as required by CALGreen requiring building energy efficiency standards, and would also be in compliance with the LAGBC, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2018-2030. Thus, there is a plan to secure natural gas supplies to meet demand. Therefore cumulative impacts will be less than significant.

Table 3.19-5
Cumulative Estimated Natural Gas Demand

Land Use	Size	Natural Gas Rates	Total (cf / mo)
Residential	9,038 units	4,011.5 cf / unit	36,255,937
Health Club	115,491 sf	2.9 cf / mo	334,924
Office	4,159,756 sf	2.9 cf / mo	12,063,292
School	350 students	2.9 cf / mo	96,425
Retail	1,096,775 sf	2.9 cf / mo	3,180,648
Hotel	1,904 rooms	4.8 cf / sf	3,655,680
Restaurant	137,211 sf	2.9 cf / mo	397,912
Bar/Lounge	28,483 sf	2.9 cf / mo	82,601
Storage	27,390 sf	2.9 cf / mo	79,431
		Related Projects	**56,146,850**
		Proposed Project	**288,931**
		Cumulative (Related + Project)	**56,435,781**

sf =square feet; cf = cubic feet; mo = month
Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate
The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
Hotel Rooms: average budget room is 300 to 400 square feet. http://www.dimensionsinfo.com/hotel-room-size/. This analysis assumes 400 square feet per room.
School – 95 square feet per student: http://www.cde.ca.gov/ls/fa/sf/completesch.asp
Table: CAJA Environmental Services, April 2017.

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 will be less than significant.

4. LIST OF PREPARERS

Lead Agency	**City of Los Angeles** Department of City Planning 200 N. Spring Street, Room 750, Los Angeles, California 90012 May Sirinopwongsagon, City Planner
Environmental Consultant	**CAJA Environmental Services** 15350 Sherman Way, Suite 315, Van Nuys, California 91406 Chris Joseph, President Seth Wulkan, Assistant Project Planner Sherrie Cruz, Senior Graphics Specialist
Project Applicant	**6421 Selma Wilcox Hotel, LLC** 1605 Cahuenga Boulevard, Los Angeles, California 90028
Architect	**Killefer Flammang Architects** 1625 Olympic Boulevard, Santa Monica, California 90404
Air Quality, GHG, Noise	**DKA Planning, LLC** 1513 W. Sepulveda Boulevard, Suite D, Torrance, California 90501 Douglas Kim, AICP
Geotechnical	**GeoConcepts, Inc.** 14428 Hamlin Street, #200, Van Nuys, California 90401 Scott J. Walter, Project Engineer
Hazards	**Partner Inc.** 2154 Torrance Boulevard, Suite 200, Torrance, California 90501 Gavin S. Jones EP, Principal
Shade/Shadow	**Steinberg Architects** 523 W. 6th Street. Suite 245, Los Angeles, California 90014
Trees	**L. Newman Design Group, Inc.** 31300 Via Colinas, Suite 104, Westlake Village, California 91362
Traffic Engineer	**Overland Traffic Consultants** 952 Manhattan Beach Blvd., #100, Manhattan Beach, California 90266 Liz Culhane

MITIGATION MONITORING PROGRAM

Section 21081.6 of the Public Resources Code requires a Lead Agency to adopt a "reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment" (Mitigation Monitoring Program, Section 15097 of the *CEQA Guidelines* provides additional direction on mitigation monitoring or reporting). This Mitigation Monitoring Program (MMP) has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the CEQA Guidelines. The City of Los Angeles is the Lead Agency for this project.

A Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. Where appropriate, this environmental document identified Project design features, regulatory compliance measures, or recommended mitigation measures to avoid or to reduce potentially significant environmental impacts of the Proposed Project. This Mitigation Monitoring Program (MMP) is designed to monitor implementation of the mitigation measures identified for the Project.

The MMP is subject to review and approval by the City of Los Angeles as the Lead Agency as part of the approval process of the project, and adoption of project conditions. The required mitigation measures are listed and categorized by impact area, as identified in the MND.

The Project Applicant shall be responsible for implementing all mitigation measures, unless otherwise noted, and shall be obligated to provide documentation concerning implementation of the listed mitigation measures to the appropriate monitoring agency and the appropriate enforcement agency as provided for herein. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the Project Applicant unless otherwise noted.
As shown on the following pages, each required mitigation measure for the proposed Project is listed and categorized by impact area, with accompanying discussion of:

Enforcement Agency – the agency with the power to enforce the Mitigation Measure.

Monitoring Agency – the agency to which reports involving feasibility, compliance, implementation and development are made, or whom physically monitors the project for compliance with mitigation measures.

Monitoring Phase – the phase of the Project during which the Mitigation Measure shall be monitored.

- Pre-Construction, including the design phase
- Construction
- Pre-Operation
- Operation (Post-construction)

Monitoring Frequency – the frequency of which the Mitigation Measure shall be monitored.

Action Indicating Compliance – the action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure has been implemented.

The MMP performance shall be monitored annually to determine the effectiveness of the measures implemented in any given year and reevaluate the mitigation needs for the upcoming year.

It is the intent of this MMP to:

Verify compliance of the required mitigation measures of the MND;

Provide a methodology to document implementation of required mitigation;

Provide a record and status of mitigation requirements;

Identify monitoring and enforcement agencies;

Establish and clarify administrative procedures for the clearance of mitigation measures;

Establish the frequency and duration of monitoring and reporting; and

Utilize the existing agency review processes' wherever feasible.

This MMP shall be in place throughout all phases of the proposed Project. The entity responsible for implementing each mitigation measure is set forth within the text of the mitigation measure. The entity responsible for implementing the mitigation shall also be obligated to provide certification, as identified below, to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure has been implemented.

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made by the Applicant or its successor subject to the approval by the City of Los Angeles through a public hearing. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. The flexibility is necessary in light of the proto-typical nature of the MMP, and the need to protect the environment with a workable program. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

Public Services

MM-Public-1 Public Services (Police – Demolition/Construction Sites)

Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

Enforcement Agency: Los Angeles Department of building and Safety

Monitoring Agency: Los Angeles Department of building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodic field inspections during construction

Action Indicating Compliance: Field inspection sign-off

MM-Public-2 and 3 Public Services (Police)

Environmental impacts may result from project implementation due to the location of the project in an area having marginal police services. However, this potential impact will be mitigated to a less than significant level by the following measure:

- The plans shall incorporate a design that references the "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the LAPD. These measures shall be approved by the LAPD prior to the issuance of building permits.

- Upon completion of the Project, the LAPD 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.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction, After Construction

Monitoring Frequency: Once, at plan check, At time of Certificate of Occupancy

Action Indicating Compliance: Issuance of building permits, Issuance of Certificate of Occupancy

Transportation and Traffic

MM-Traffic-1 Transportation

- **Construction Traffic Control/Management Plan.** A construction work site traffic control plan shall be submitted to DOT for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. All construction-related traffic shall be restricted to off-peak hours.

Enforcement Agency: Los Angeles Department of Building and Safety, Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Ongoing during construction

Action Indicating Compliance: Issuance of Certificate of Occupancy or Land Use Permit

MM-Traffic-2 Transportation Demand Management and Monitoring Program.

a. The Applicant shall prepare and submit a preliminary Transportation Demand Management Plan (TDM) to the Department of Transportation prior to the issuance of the first building permit for the Project. A final TDM shall be submitted and approved by the Department of Transportation prior to the issuance of the first certificate of occupancy for the project.

   The TDM shall include strategies, as determined to be appropriate by the Department of Transportation, which would have a minimum ten (10) percent effectiveness in reducing new vehicle trips.

   In the event that the Project would provide twenty (20) or more required parking spaces off-site, the TDM shall demonstrate a minimum twenty (20) percent effectiveness in reducing new vehicle trips.

b. In the event that the Project would provide twenty (20) or more parking spaces off- site and is required to implement a TDM which has a minimum twenty (20) percent effectiveness in reducing the total net project trips, a Monitoring Program (MP) shall be prepared to provide continued monitoring of the TDP's effectiveness. The MP shall be prepared by a licensed Traffic Engineer and submitted to the Department of Transportation for review. The MP shall continue until such time that the Project has shown, for three consecutive years, at a minimum of 85 percent occupancy, achievement of the peak hour trip volume requirements listed. Should the review show that the peak hour trip cap threshold has been exceeded the Project shall have one year to attain compliance or be subject to a penalty program.

   Implementation of the TDM shall be at the Project's expense.

   Strategies may include, but shall not be limited to, the following:

1. Provide guest assistance on arrival and departure to find options to personal or rented vehicles to access the site.

2. If found feasible by LADOT and Metro, improve the existing bus stop on the north side of Hollywood Boulevard east of Wilcox Avenue where there is an existing sign, bench and trash receptacle with a weather protected cover. Improve the bus stop on the south side of Hollywood Boulevard west of Cahuenga Boulevard where a bus sign only with a bench, trash receptacle, weather protected cover and bench. Improve the bus stop on the north side of Sunset Boulevard west of Wilcox Avenue where a bus sign, a bench, and trash receptacle with a weather protected cover;

3. Provide a visible on-site kiosk with options for ridesharing, bus routes and bike routes in a prominent area(s) in view for hotel guests, employees and patrons of the restaurants;

4. Provide information for guests of the hotel upon check in that includes the transit, bike routes, and nearby walking opportunities as options to use rather than person vehicles;

5. Provide an on-site TDM manager to assist hotel guests navigate the alternative modes of transportation options, in matching rideshare partners for the employees, determining transit routes for employees, and promoting TDM program;

6. Provide access pass and transit pass reductions for employees;

7. Provide bicycle spaces to encourage cycling as an alternative to single occupant vehicles;

8. Provide bicycle sharing service for guests and employees use;

Provide amenities to encourage guests of the hotel spend some of their time eating, relaxing and recreating on-site.

Enforcement Agency: Los Angeles Department of Transportation

Monitoring Agency: Los Angeles Department of Transportation

Monitoring Phase: During Operations

Monitoring Frequency: Ongoing

Action Indicating Compliance: None – Ongoing compliance required

MM-Traffic-3 Pedestrian Safety

- The developer and contractors shall maintain ongoing contact with administrator of Selma Elementary School. The administrative offices shall be contacted when demolition, grading and construction activity begin on the project site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus

routes to the schools from either the administrators or from the LAUSD's Transportation Branch (213)580-2950 or (213)580-2900 and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.

Enforcement Agency: Los Angeles Department of Building and Safety, LADOT, BOE

Monitoring Agency: Los Angeles Department of Building and Safety, LADOT

Monitoring Phase: Construction

Monitoring Frequency: Ongoing

Action Indicating Compliance: Issuance of Certificate of Occupancy

Project Design Features

In addition to the required mitigation measures, the project also includes project design features that prevent any significant impacts from occurring through design. These project design features are included below, and are conditions of the project that must be monitored and enforced as if they were mitigation measures. While these project design features are not required by the code, the City of Los Angeles has required them of the project, and they may not be deleted except by public hearing. These project design features are listed below:

Aesthetics

PDF-Aesthetics-1 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.

PDF-Aesthetics-2 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.

Noise
PDF-Noise-1 The rooftop deck would include a glass or heavy plastic safety wall (minimum 6 feet in height) around its perimeter.

Regulatory Compliance Measures

In addition to the Mitigation Measures required of the project, and any proposed Project Design Features, the applicant shall also adhere to any applicable Regulatory Compliance Measures required by law. Listed below is a list of often required Regulatory Compliance Measures. Please note that requirements are determined on a case by case basis, and these are an example of the most often required Regulatory Compliance Measures.

AESTHETICS

- **Regulatory Compliance Measure RC-AE-1 (Hillside)**: **Compliance with Baseline Hillside Ordinance**. To ensure consistency with the Baseline Hillside Ordinance, the project shall comply with the City's Hillside Development Guidelines, including but not limited to setback requirements, residential floor area maximums, height limits, lot coverage and grading restrictions.

- **Regulatory Compliance Measure RC-AE-2 (LA River): Compliance with provisions of the Los Angeles River Improvement Overlay District.** The project shall comply with development regulations set forth in Section 13.17.F of the Los Angeles Municipal Code as applicable, including but not necessarily limited to, landscaping, screening/fencing, and exterior site lighting.

- **Regulatory Compliance Measure RC-AE-3 (Vandalism)**: **Compliance with provisions of the Los Angeles Building Code.** The project shall comply with all applicable building code requirements, including the following:
    - Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to 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.

- **Regulatory Compliance Measure RC-AE-4 (Signage): Compliance with provisions of the Los Angeles Building Code.** The project shall comply with the Los Angeles Municipal Code Section 91.6205, including on-site signage maximums and multiple temporary sign restrictions, as applicable.

- **Regulatory Compliance Measure RC-AE-5 (Signage on Construction Barriers): Compliance with provisions of the Los Angeles Building Code.** The project shall comply with the Los Angeles Municipal Code Section 91.6205, including but not limited to the following provisions:
    - The applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: “POST NO BILLS”.
    - Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier.
    - The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

AGRICULTURE and FORESTRY

AIR QUALITY

- **Regulatory Compliance Measure RC-AQ-1(Demolition, Grading and Construction Activities): Compliance with provisions of the SCAQMD District Rule 403.** The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
    - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
    - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
    - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
    - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
    - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
    - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
    - Trucks having no current hauling activity shall not idle but be turned off.

- **Regulatory Compliance Measure RC-AQ-2:** In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

- **Regulatory Compliance Measure RC-AQ-3:** In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

- **Regulatory Compliance Measure RC-AQ-4:** The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

- **Regulatory Compliance Measure RC-AQ-5:** The Project shall install odor-reducing equipment in accordance with South Coast Air Quality Management District Rule 1138.

- **Regulatory Compliance Measure RC-AQ-6:** New on-site facility nitrogen oxide emissions shall be minimized through the use of emission control measures (e.g., use of best available control technology for new combustion sources such as boilers and water heaters) as required by South Coast Air Quality Management District Regulation XIII, New Source Review.

- **Regulatory Compliance Measure RC-AQ-7 (Spray Painting): Compliance with provisions of the SCAQMD District Rule 403.** The project shall comply with all

applicable rules of the Southern California Air Quality Management District, including the following:

- All spray painting shall be conducted within an SCAQMD-approved spray paint booth featuring approved ventilation and air filtration system.
- Prior to the issuance of a building permit, use of land, or change of use to permit spray painting, certification of compliance with SCAQMD air pollution regulations shall be submitted to the Department of Building and Safety.

- **Regulatory Compliance Measure RC-AQ-8 (Wireless Facilities):**If rated higher than 50 brake horsepower (bhp), permit required in accordance with SCAQMD Rule 1470 - Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Initial Engines and SCAQMD Rule 1110.2 - Emissions from Gaseous- and Liquid- Field Engines.

BIOLOGY

- **(Duplicate of WQ Measure) Regulatory Compliance Measure RC-WQ-5 (Alteration of a State or Federal Watercourse):** The project shall comply with the applicable sections of the federal Clean Water Act (CWA) and California's Porter Cologne Water Quality Control Act (Porter Cologne). Prior to the issuance of any grading, use of land, or building permit which may affect an existing watercourse, the applicant shall consult with the following agencies and obtain all necessary permits and/or authorizations, to the satisfaction of the Department of Building and Safety. Compliance shall be determined through written communication from each jurisdictional agency, a copy of which shall be submitted to the Environmental Review case file for reference:
  - *United States Army Corps of Engineers*. The applicant shall obtain a Jurisdictional Determination (preliminary or approved), or a letter otherwise indicating that no permit is required. Contact: Aaron O. Allen, Chief - North Coast Branch, Regulatory Division, 805-585-2148.
  - *State Water Resources Control Board*. The applicant shall consult with the 401 Certification and Wetlands Unit and obtain all necessary permits and/or authorizations, or a letter otherwise indicating that no permit is required. Contact: 401 Certification and Wetlands Unit, Los Angeles Region, 320 W 4th Street, #200, Los Angeles, CA 90013, (213) 576-6600.
  - *California Department of Fish and Wildlife*. The applicant shall consult with the Lake and Streambed Alteration Agreement Program and obtain a Streambed Alteration Agreement, or a letter otherwise indicating that no permit is required. Contact: LSAA Program, 4949 Viewridge Avenue, San Diego, CA 92123, (858) 636-3160.

CULTURAL RESOURCES

- **Regulatory Compliance Measure RC-CR-1 (Designated Historic-Cultural Resource): Compliance with United States Department of the Interior – National Park Service – Secretary of the Interior's Standards for the Treatment of Historic Properties.** The project shall comply with the Secretary of the Interior's Standards for Historical Resources, including but not limited to the following measures:

- Prior to the issuance of any permit, the project shall obtain clearance from the Department of Cultural Affairs for the proposed work.
- A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
- The historic character of a property shall be retained and preserved. The removal of historic material or alteration of features and spaces shall be avoided.
- Each property shall 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 buildings, shall not be undertaken.
- Most properties change over time; those changes that have acquired significance in their own right shall be retained and preserved.

- **Regulatory Compliance Measure RC-CR-2 (Archaeological):** If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the proposed Modified Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.
  - Distinctive features, finishes and construction techniques or examples of skilled craftsmanship which characterize an historic property shall be preserved.
  - Deteriorated historic features shall be repaired rather than replaced. Where the severity if deterioration requires replacement of a distinctive historic feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
  - Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
  - Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
  - New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
  - New additions and adjacent or related new construction shall 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.

- **Regulatory Compliance Measure RC-CR-3 (Paleontological):** If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be

treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

- **Regulatory Compliance Measure CR-4 (Human Remains):** If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

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

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

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

    - The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
    - If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

GEOLOGY AND SOILS

- **Regulatory Compliance Measure RC-GEO-1 (Seismic):** The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

- **Regulatory Compliance Measure RC-GEO-2 (Hillside Grading Area):** The grading plan shall conform with the City's Landform Grading Manual guidelines, subject to approval by the Advisory Agency and the Department of Building and Safety's Grading Division. Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.

- **Regulatory Compliance Measure RC-GEO-3 (Landslide Area):** Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any landslide and soil displacement, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to:

- ground stabilization
- selection of appropriate foundation type and depths
- selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures

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

- **Regulatory Compliance Measure RC-GEO-4 (Liquefaction Area):** The project shall comply with the Uniform Building Code Chapter 18. Division1 Section 1804.5 Liquefaction Potential and Soil Strength Loss. Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to:
  - ground stabilization
  - selection of appropriate foundation type and depths
  - selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures.

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

- **Regulatory Compliance Measure RC-GEO-5 (Subsidence Area):** Prior to the issuance of building or grading permits, the applicant shall submit a geotechnical report prepared by a registered civil engineer or certified engineering geologist to the written satisfaction of the Department of Building and Safety. The geotechnical report shall assess potential consequences of any subsidence and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

- **Regulatory Compliance Measure RC-GEO-6 (Expansive Soils Area):** Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The geotechnical report shall assess potential consequences of any soil expansion and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements or any combination of these measures. The project shall comply with the conditions contained

within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project, and as it may be subsequently amended or modified.

- **Regulatory Compliance Measure RC-GHG-1 (Green Building Code):** In accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code), the Project shall comply with all applicable mandatory provisions of the 2013 Los Angeles Green Code and as it may be subsequently amended or modified.

HAZARDS AND HAZARDOUS MATERIALS

- **Regulatory Compliance Measure RC-HAZ-1: Explosion/Release (Existing Toxic/Hazardous Construction Materials)**
  - (**Asbestos**) Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.
  - (**Lead Paint**) Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.
  - (**Polychlorinated Biphenyl – Commercial and Industrial Buildings**) Prior to issuance of a demolition permit, a polychlorinated biphenyl (PCB) abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.

- **Regulatory Compliance Measure RC-HAZ-2: Explosion/Release (Methane Zone):** As the Project Site is within a methane zone, prior to the issuance of a building permit, the Site shall be independently analyzed by a qualified engineer, as defined in Ordinance No. 175,790 and Section 91.7102 of the LAMC, hired by the Project Applicant. The engineer shall investigate and design a methane mitigation system in compliance with the LADBS Methane Mitigation Standards for the appropriate Site Design Level which will prevent or retard potential methane gas seepage into the building. The Applicant shall implement the engineer's design recommendations subject to DOGGR, LADBS and LAFD plan review and approval.

- **Regulatory Compliance Measure RC-HAZ-3: Explosion/Release (Soil Gases):** During subsurface excavation activities, including borings, trenching and grading, OSHA worker safety measures shall be implemented as required to preclude any exposure of workers to unsafe levels of soil-gases, including, but not limited to, methane.

- **Regulatory Compliance Measure RC-HAZ-4 Listed Sites (Removal of Underground Storage Tanks):** Underground Storage Tanks shall be decommissioned or removed as determined by the Los Angeles City Fire Department Underground Storage Tank Division. If any contamination is found, further remediation measures shall be developed with the assistance of the Los Angeles City Fire Department and other

appropriate State agencies. Prior to issuance of a use of land or building permit, a letter certifying that remediation is complete from the appropriate agency (Department of Toxic Substance Control or the Regional Water Quality Control Board) shall be submitted to the decision maker.

- **Regulatory Compliance Measure RC-HAZ-5 (Hazardous Materials Site):** Prior to the issuance of any use of land, grading, or building permit, the applicant shall obtain a sign-off from the Fire Department indicating that all on-site hazardous materials, including contamination of the soil and groundwater, have been suitably remediated, or that the proposed project will not impede proposed or on-going remediation measures.

HYDROLOGY AND WATER QUALITY

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

- **Regulatory Compliance Measure RC-WQ-2: Dewatering.** If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the Los Angeles Regional Water Quality Control Board at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges.

- **Regulatory Compliance Measure RC-WQ-3: Low Impact Development Plan.** Prior to issuance of grading permits, the Applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

- **Regulatory Compliance Measure RC-WQ-4: Development Best Management Practices.** The Best Management Practices shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B

Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

- **Regulatory Compliance Measure RC-WQ-5 (Alteration of a State or Federal Watercourse):** The project shall comply with the applicable sections of the federal Clean Water Act (CWA) and California's Porter Cologne Water Quality Control Act (Porter Cologne). Prior to the issuance of any grading, use of land, or building permit which may affect an existing watercourse, the applicant shall consult with the following agencies and obtain all necessary permits and/or authorizations, to the satisfaction of the Department of Building and Safety. Compliance shall be determined through written communication from each jurisdictional agency, a copy of which shall be submitted to the Environmental Review case file for reference:
  - *United States Army Corps of Engineers*. The applicant shall obtain a Jurisdictional Determination (preliminary or approved), or a letter otherwise indicating that no permit is required. Contact: Aaron O. Allen, Chief - North Coast Branch, Regulatory Division, 805-585-2148.
  - *State Water Resources Control Board*. The applicant shall consult with the 401 Certification and Wetlands Unit and obtain all necessary permits and/or authorizations, or a letter otherwise indicating that no permit is required. Contact: 401 Certification and Wetlands Unit, Los Angeles Region, 320 W 4th Street, #200, Los Angeles, CA 90013, (213) 576-6600.
  - *California Department of Fish and Wildlife*. The applicant shall consult with the Lake and Streambed Alteration Agreement Program and obtain a Streambed Alteration Agreement, or a letter otherwise indicating that no permit is required. Contact: LSAA Program, 4949 Viewridge Avenue, San Diego, CA 92123, (858) 636-3160.

- **Regulatory Compliance Measure RC-WQ-6 (Flooding/Tidal Waves):** The project shall comply with the requirements of the Flood Hazard Management Specific Plan, Ordinance No. 172081 effective 7/3/98.

LAND USE AND PLANNING

- **Regulatory Compliance Measure RC-LU-1 (Slope Density):** The project shall not exceed the maximum density permitted in Hillside Areas, as calculated by the formula set forth in Los Angeles Municipal Code Section 17.05-C (for tracts) or 17.50-E (for parcel maps).

MINERAL RESOURCES

NOISE

- **Regulatory Compliance Measure RC-NO-1 (Demolition, Grading, and Construction Activities):** The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

POPULATION AND HOUSING

- **New Regulatory Compliance Measure RC-PH-1 (Tenant Displacement):**

- **Apartment Converted to Condominium** - Prior to final map recordation, and pursuant to the provisions of Section 12.95.2-G and 47.06 of the Los Angeles Municipal Code (LAMC), a tenant relocation plan shall be submitted to the Los Angeles Housing Department for review and approval.
- **Apartment Demolition** - Prior to the issuance of a demolition permit, and pursuant to the provisions of Section 47.07 of the Los Angeles Municipal Code, a tenant relocation plan shall be submitted to the Los Angeles Housing Department for review and approval.
- **Mobile Home Park Closure or Conversion to Different Use** Prior to the issuance of any permit or recordation, and pursuant to the provisions of Section 47.08 and 47.09 of the Los Angeles Municipal Code, a tenant relocation plan and mobile home park closure impact report shall be submitted to the Los Angeles Housing Department for review and approval.

PUBLIC SERVICES

Schools

- **Regulatory Compliance Measure RC-PS-1 (Payment of School Development Fee)** Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with California Government Code Section 65995.

Parks

- **Regulatory Compliance Measure RC-PS-2 (Increased Demand For Parks Or Recreational Facilities):**
  - (*Subdivision*) Pursuant to Section 17.12-A or 17.58 of the Los Angeles Municipal Code, the applicant shall pay the applicable Quimby fees for the construction of dwelling units.
  - (*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.

- **Regulatory Compliance Measure RC-PS-3 (Increase Demand For Parks Or Recreational Facilities – Zone Change)** Pursuant to Section 12.33 of the Los Angeles Municipal Code, the applicant shall pay the applicable fees for the construction of dwelling units.

RECREATION

See RC measures above under Parks.

PUBLIC UTILITIES AND SERVICE SYSTEMS

Water Supply

- **Regulatory Compliance Measure RC-WS-1 (Fire Water Flow)** The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the Proposed Project, and will contact a Water Service Representative at the LADWP to

order a SAR. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

- **Regulatory Compliance Measure RC-WS-2 (Green Building Code):** The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's water use.

- **Regulatory Compliance Measure RC-WS-4 (Landscape)** 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).

Energy

- **Regulatory Compliance Measure RC-EN-1(Green Building Code):** The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use.

Solid Waste

- **Regulatory Compliance Measure RC-SW-1 (Designated Recycling Area)** In compliance with Los Angeles Municipal Code, the proposed Modified Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

- **Regulatory Compliance Measure RC-SW-2** (**Construction Waste Recycling)** In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which will total 70 percent by 2013, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the Los Angeles Municipal Code, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

- **Regulatory Compliance Measure RC-SW-3 (Commercial/Multifamily Mandatory Recycling)** In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB341.