

ORIGINAL



APPLICATIONS:

APPEAL APPLICATION

This application is to be used for any appeals authorized by the Los Angeles Municipal Code (LAMC) for discretionary actions administered by the Department of City Planning.

1. APPELLANT BODY/CASE INFORMATION

Appellant Body:

- Area Planning Commission, City Planning Commission, City Council, Director of Planning

Regarding Case Number: VTT-73568-1A; ENV-2015-2026-EIR (Rel. Case: CPC-2015-2025-DB-MCUP-CU-SPR)

Project Address: 1540-1552 Highland Ave.; 6663-6675 Selma Ave., 1543-1553 McCadden Pl.; etc.

Final Date to Appeal: 11/13/2018

- Type of Appeal: Appeal by Applicant/Owner, Appeal by a person, other than the Applicant/Owner, claiming to be aggrieved, Appeal from a determination made by the Department of Building and Safety

2. APPELLANT INFORMATION

Appellant's name (print): Ellis Raskin

Company: Angel Law

Mailing Address: 2601 Ocean Park Blvd., Suite 205

City: Santa Monica State: CA Zip: 90405

Telephone: (310) 314-6433 E-mail: eraskin@angellaw.com

Is the appeal being filed on your behalf or on behalf of another party, organization or company?

- Self, Other: Hollywood Media Center, LLC

Is the appeal being filed to support the original applicant's position? Yes No

3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable):

Company:

Mailing Address:

City: State: Zip:

Telephone: E-mail:

4. JUSTIFICATION/REASON FOR APPEAL

Is the entire decision, or only parts of it being appealed? Entire Part
 Are specific conditions of approval being appealed? Yes No

If Yes, list the condition number(s) here: _____

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- The reason for the appeal
- Specifically the points at issue
- How you are aggrieved by the decision
- Why you believe the decision-maker erred or abused their discretion

5. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: Edwin [Signature] Date: 11/13/2018

6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

- Eight (8) sets of the following documents are required for each appeal filed (1 original and 7 duplicates):
 - Appeal Application (form CP-7769)
 - Justification/Reason for Appeal
 - Copies of Original Determination Letter
- A Filing Fee must be paid at the time of filing the appeal per LAMC Section 19.01 B.
 - Original applicants must provide a copy of the original application receipt(s) (required to calculate their 85% appeal filing fee).
- All appeals require noticing per the applicable LAMC section(s). Original Applicants must provide noticing per the LAMC, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of the receipt.
- Appellants filing an appeal from a determination made by the Department of Building and Safety per LAMC 12.26 K are considered Original Applicants and must provide noticing per LAMC 12.26 K.7, pay mailing fees to City Planning's mailing contractor (BTC) and submit a copy of receipt.
- A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.
- Appeals of Density Bonus cases can only be filed by adjacent owners or tenants (must have documentation).
- Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.
- A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. [CA Public Resources Code ' 21151 (c)].

This Section for City Planning Staff Use Only		
Base Fee: <u>\$89.00</u>	Reviewed & Accepted by (DSC Planner): <u>Sarah Goldman</u>	Date: <u>11/13/2018</u>
Receipt No: <u>0302140995</u>	Deemed Complete by (Project Planner):	Date:
<input checked="" type="checkbox"/> Determination authority notified		<input type="checkbox"/> Original receipt and BTC receipt (if original applicant)

EXHIBIT 1: GROUNDS FOR APPEAL

ANGEL LAW

**2601 Ocean Park Blvd., Suite 205
Santa Monica, CA 90405-5269
Tel: (310) 314-6433**

**fangel@angellaw.com
eraskin@angellaw.com**

November 13, 2018

Honorable President Herb Wesson and
Members of the Los Angeles City Council
Los Angeles City Hall
200 N. Spring St.
Los Angeles, CA 90012

**RE: Grounds for Appeal of Case Nos. VTT-73568-1A & CPC-2015-2025-DB-MCUP-CU-SPR
(CEQA File No. ENV-2015-2026-EIR; SCH No. 2015101073)**

Dear President Wesson and Honorable Councilmembers:

On behalf of the Hollywood Media Center, LLC (HMC), we respectfully appeal the City Planning Commission's (CPC) decisions to sustain the approval of a vesting tentative tract map (VTTM; No. 73568), certify a final environmental impact report (EIR; File No. ENV-2015-2026-EIR; SCH No. 2015101073), and approve discretionary entitlements for the Crossroads Hollywood Project (Project).

This letter provides reasons and justifications for our appeal. We will show that the CPC approved a substantially defective EIR that fails to comply with the requirements of the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et seq.), and the State CEQA Guidelines (Guidelines; Cal. Code Regs., tit. 14, § 15000 et seq.).¹ The EIR fails to disclose, evaluate, and mitigate direct, indirect, and cumulative Project impacts on the environment. We will also show that the CPC's decision to sustain the approval of VTTM No. 73568, and its approval of other discretionary entitlements, violated state law and the Los Angeles Municipal Code (LAMC).

Given the Project's scale, intensity, and projected lifespan, we urge this council to take this opportunity to correct serious deficiencies in this Project's environmental review. This Project will

¹ We hereby re-adopt and incorporate by reference HMC's previous comment letter and appeal to the CPC.

dramatically re-shape Hollywood for generations to come, and it is crucial that the City of Los Angeles (City) adequately inform its residents of the Project's environmental effects.

I. Background Information About the Crossroads Project

"They're destroying one community to create another"

– *Ged Kenslea, Spokesman for the AIDS Healthcare Foundation, commenting on the Crossroads Project*²

The Crossroads Project would bring over 1.2 million square feet of new development to an 8.3-acre site in Hollywood. The press has referred to the Project as a collection of "glassy monoliths," "behemoth towers," "exceedingly large towers," and "monster towers."³ They will stand in stark contrast to existing structures in the neighborhood.

On August 15, 2018, the Advisory Agency certified the Project's final EIR, approved VTTM No. 73568, and approved other discretionary entitlements for the project. HMC and Livable LA appealed the Advisory Agency's decisions to the CPC. Our appeals explained that the EIR contained numerous deficiencies and that the Advisory Agency prejudicially abused its discretion by certifying a legally inadequate EIR and by approving a VTTM and entitlements that did not comply with state and local law.

The CPC held a hearing on our appeals on September 13, 2018. At the hearing, many members of the Hollywood community spoke out against the Project and asked the CPC to scale back the Project, to protect the irreplaceable rent-stabilized units located at the project site, and to remedy information disclosure inadequacies in the EIR. Despite the large public outcry, the CPC denied the appeals. On October 31, 2018, the CPC issued letters of determination for its decisions of September 13, 2018. Livable LA and HMC have timely appealed the CPC's determinations.

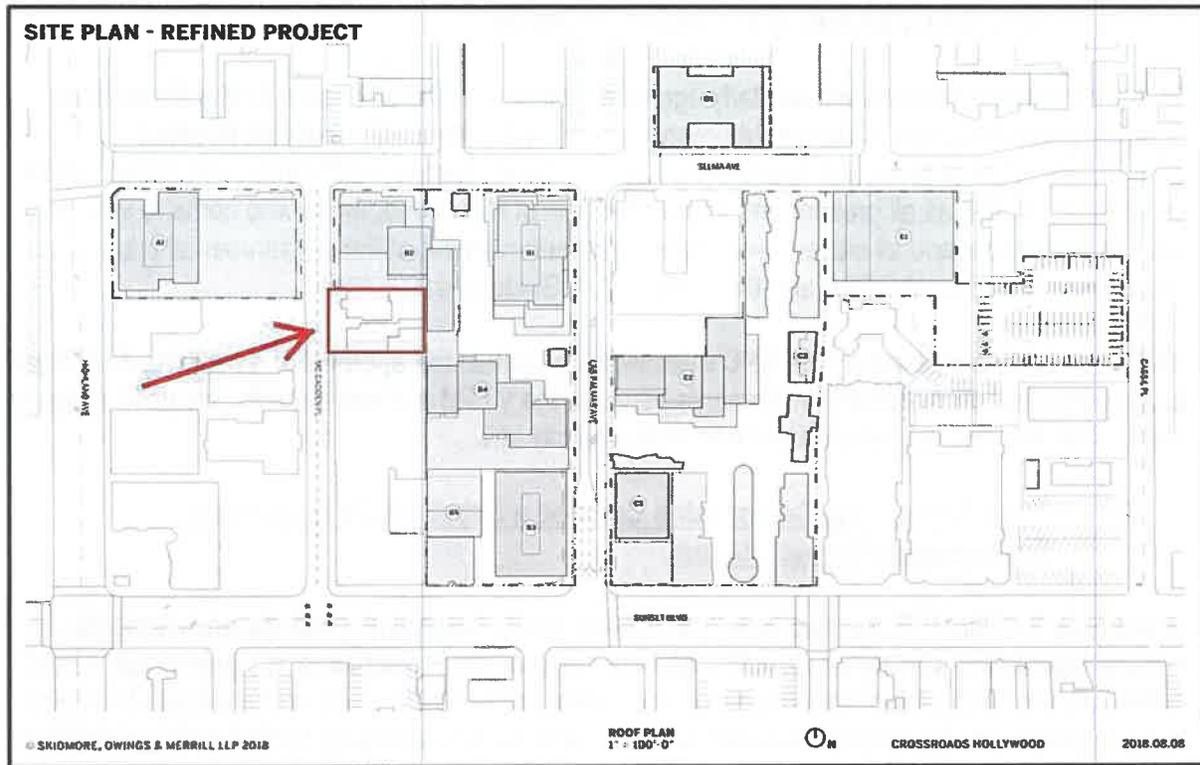
II. Background Information About HMC

HMC owns 1534 and 1540 N. McCadden Place, Hollywood, CA 90028 (collectively, the **Subject Properties**), which are located adjacent to the Project site (immediately southwest of proposed building no. B2). On the following page, we have provided a map showing the location of the Subject Properties relative to the Project site; the Subject Properties are outlined in red.

² Zahniser, L.A. *Officials Back Three-tower Hollywood Project with 950 Apartments*, L.A. Times (September 13, 2018), available at <http://www.latimes.com/local/lanow/la-me-ln-crossroads-hollywood-20180913-story.html>.

³ Johnson, *Show Business is Returning to a Glitzier, Taller Hollywood*, Variety (Nov. 04, 2015), available at <https://variety.com/2015/digital/news/hollywood-development-netflix-viacom-1201632106/>; Wattenhofer, *All the Details on the Huge Redevelopment Coming to Hollywood's Crossroads of the World*, Curbed L.A. (Oct. 23, 2015), available at <https://la.curbed.com/2015/10/23/9908052/crossroads-of-the-world-redevelopment>.

Location of 1534 and 1540 N. McCadden Place:



The property at 1540 N. McCadden Place is a creative artists space that houses a well-known production company that occupies a majority of the building. 1540 N. McCadden contains a recording studio that hosts live and delayed broadcasting indoors and outdoors from the facility, as well as music and sound recording and editing. Additionally, there is currently an up-scale restaurant located at 1534 N. McCadden Place, for which the City has issued a renewed Conditional Use Permit (CUP) for the property, including an outdoor dining area of approximately 3000 square feet.

The City's failure to adequately disclose and analyze the Project's adverse environmental effects on the local community frustrates residents' and decisionmakers' abilities to make informed decisions about this Project and other development projects in Hollywood. The City's failure to mitigate those adverse environmental effects severely detracts from local residents' quality of life, health, wellbeing, and personal satisfaction. This is especially true for HMC and members of the public who utilize the services at the Subject Properties, since the City has repeatedly refused to acknowledge that the Subject Properties are sensitive receptors for noise, vibration, light, dust, and other airborne pollutants. In light of these information disclosure inadequacies, the EIR fails to

provide easily-implementable mitigation measures that could reduce the severity of adverse environmental effects. During the project's lengthy 5-7 year-long construction period, the Project's adverse environmental effects will severely disrupt services at the Subject Properties. Operational impacts will also disrupt services at the Subject Properties.

Other community members are similarly aggrieved, since the EIR also failed to identify several other sensitive receptors in the neighborhood, including the Musician's Institute (located immediately south of proposed building no. A1). For these reasons, HMC brings this appeal on its own behalf, as well as all present and future residents of Hollywood, those who come to visit or work in Hollywood, and all citizens interested in the enforcement of the environmental information disclosure provisions of CEQA and the State CEQA Guidelines.

HMC is similarly aggrieved by the CPC's decisions to sustain the approval of VTTM No. 73568 and to approve other discretionary entitlements because the VTTM and entitlements rely upon a legally inadequate EIR and are inconsistent with state and city law.

III. The City Planning Commission Certified a Substantially Inadequate Environmental Impact Report

In certifying the final EIR and approving the Project, and in determining that the environmental impacts associated with the construction and operation of the Project were adequately addressed in the EIR, the CPC prejudicially abused its discretion under CEQA and the Guidelines. The CPC failed to proceed in the manner required by CEQA and the Guidelines by certifying a final EIR that falls substantially short of CEQA's and the Guidelines' standards of environmental disclosure and impact assessment, and the Guidelines' EIR content requirements.

CEQA compliance "serve[s] an important purpose in helping to shape and inform [public officials'] exercise of discretion." (*Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 122.) To that end, "the public and decision-makers, for whom the EIR is prepared, should . . . have before them the basis for [EIR conclusions] so as to enable them to make an *independent, reasoned judgment.*" (*Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 831, emphasis added.) Even if City staff or the EIR drafters know the answers to those questions, to paraphrase *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, "the critical point" is that the public and the City Council "must be equally informed." (*Id.* at 404.) The EIR is a "document of accountability." (*Id.* at 392; accord, *Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1164-1165.)

"[T]he ultimate decision of whether to approve a project, be that decision right or wrong, is a nullity if based upon an EIR that does not provide the decision-makers, and the public, with the information about the project that is required by CEQA." [Citation.] (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 88.) "CEQA is enforced with powerful

remedies to ensure that the review process is completed appropriately and the various findings are made before projects go forward. Litigants, including members of the public, may apply to courts to order agencies to void, either in whole or in part 'any determination, finding, or decision . . . made without compliance' with CEQA. [Citations.]” (*Friends of the Eel River v. North Coast Railroad Authority* (2017) 3 Cal.5th 677, 713.)

As we will show in further detail below, many aspects of the EIR fall far short of the standards required by CEQA and the Guidelines.

a. Failure to Provide an Adequate and Stable Project Description

An EIR must provide a description of “the project’s technical, economic, and environmental characteristics” (Guidelines § 15124, subd. (c).) “An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.)

Here, the EIR provides a substantially defective project description that denies City decisionmakers and members of the public a meaningful opportunity to scrutinize the Project’s environmental effects. Many key questions about the Project’s scope, layout, design, and operation remain unanswered. These questions include (but are not limited to) the following:

- Where will the 22 “alcohol-related uses” be located? How do we know that they are not inappropriately concentrated in one specific portion of the project site, and how do we know that they are not inappropriately located in close proximity to a school or church?
- What types of illuminated signage will be used at the Project site, how big will the signs be, and where will they be located?⁴
- Will the buildings on the Project site utilize exterior cladding that minimizes the risk of bird collisions?⁵
- To what extent will the retail, entertainment, and dining venues be affordable to low- and moderate-income members of the community?⁶

⁴ The City may argue that environmental effects of signage are merely aesthetic impacts that are exempt from scrutiny under Senate Bill 743. Not so. The public needs to know the type, size, and location of signage to determine whether the Project is consistent with General Plan and LAMC provisions that regulate signage.

⁵ For more information about bird deaths caused by collisions with buildings, see American Bird Conservancy, *Up to One Billion Birds May Be Killed Annually in Building Collisions, New Study Says*, available at <https://abcbirds.org/article/up-to-one-billion-birds-may-be-killed-annually-in-building-collisions-new-study-says/>.

⁶ See Harris, *Environmental Justice at the Local and Regional Level Legal Background*, available at https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf.

- During the construction phase, what direction will vehicles travel on McCadden Place (north to south, or south to north)?
- Where, specifically, will on-street parking be removed?⁷
- Where will taxis and ridesharing services queue while waiting to pick up guests and patrons from residential, hotel, restaurant, or entertainment facilities?
- How can the project possibly squeeze 176 trees (each of which will be planted in a 24-inch box) onto a single roof deck? (See draft EIR at p. IV.K.5-19.)
- What is the albedo of ground-level and rooftop surfaces?
- In the modified Project, will the subsurface vacation of Las Palmas Avenue to construct subterranean parking necessitate the removal or relocation of the underground gas lines that run along Las Palmas? (See draft EIR at p. IV.M.4-17 [disclosing existence of underground gas lines].)

The EIR also fails to provide a stable project description. In lengthy, last-minute errata published in August 2018 – shortly before the CPC’s hearing on September 13 – the City introduced significant modifications to the Project’s design and made substantial revisions to its analysis of the Project’s environmental effects. CEQA does not permit these types of significant last-minute changes, introduced long after the close of the public comment period. If a Public Agency makes significant changes to an EIR after the close of the public comment period, the EIR must be recirculated to allow the public and other public agencies a meaningful opportunity to comment on the EIR. (See Guidelines § 15088.5, subs. (a) & (b).)

b. Failure to Provide an Adequate Description of the Project’s Environmental Setting

“An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” (Guidelines § 15125, subd. (a).) “Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project.” (*Id.* at subd. (c).) Here, the EIR fails to provide a legally adequate description of the Project’s environmental setting.

⁷ Bureau of Engineering Standard Condition S-3 requires the sidewalks on some streets to be widened. (CPC Letter of Determination for VTT-73568-1A at p. 52.) We presume this will result in the loss of on-street parking on those streets, but the EIR doesn’t specifically identify the on-street parking spaces that will be eliminated.

i. Failure to Disclose Sensitive Receptors Adjacent to the Project Site

As discussed in further detail below in our arguments regarding air quality, noise, and vibration impacts, the EIR fails to disclose the existence of sensitive receptors located immediately adjacent to the Project site.

ii. Failure to Disclose Related Projects

In its discussion of a project’s environmental setting, an EIR must disclose the existence of related projects. An EIR must do so to account for the fact that “[t]he possible effects of a project [may be] individually limited but cumulatively considerable.” (Pub. Resources Code, § 21083, subd. (b)(2).) Consequently, an EIR must discuss cumulative, incremental impacts caused by a project when effects are combined with the effects of other, closely related past, present, and reasonably foreseeable future projects. (*Id.*; see *North Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 682; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 721 [EIR held inadequate where it “improperly focused upon the individual project’s relative effects and omitted facts relevant to an analysis of the collective effect this and other sources will have upon air quality”].)

Here, the EIR fails to disclose the existence of at least 11 other related projects. (See list of related projects in DEIR at pp. III-8 to III-19; see also map of related projects at p. III-20.)⁸

Project Name	Env. No.	Address	Link to CEQA Document(s)
Coronel Apartment Project	ENV-2012-110-EIR	1600-1608 N. Serrano Ave. & 1601-1605 N. Hobart Boulevard, Los Angeles, CA 90027	Final EIR: http://planning.lacity.org/eir/CoronelApt/FEIR/index.html Draft EIR: http://planning.lacity.org/eir/CoronelApt/DEIR/index.html

⁸ We discovered these 11 undisclosed related projects by checking the following City Planning Department websites:

- List of final EIRs: <https://planning.lacity.org/eir/TocFeir.htm>
- List of draft EIRs: <https://planning.lacity.org/eir/TocDeir.htm>
- List of Notices of Preparation: <https://planning.lacity.org/eir/nops/TOCNOP.htm>

Project Name	Env. No.	Address	Link to CEQA Document(s)
SunWest Project	ENV-2015-2448-EIR	5509, 5511, 5515, 5517, 5519, 5521, 5523, 5525, 5527, 5529 West Sunset Boulevard; 1505, 1507, 1509, 1511, 1515, 1523, 1525, 1527, 1529, 1531, 1535 North Western Avenue; and 5518 West Harold Way, Los Angeles, California, 90028	Final EIR: https://planning.lacity.org/eir/SunWest/FEIR/FEIR%20SunWest%20Project.html Draft EIR: https://planning.lacity.org/eir/sunwest/DEIR/DEIR%20SunWest%20Project.html
6200 West Sunset Boulevard Project	ENV-2015-3603-EIR	6200–6218 W. Sunset Boulevard, 1437–1441 N. El Centro Avenue, 6211 W. Leland Way, Los Angeles, California 90028	Final EIR: https://planning.lacity.org/eir/6200WestSunset/FEIR/Index.html Draft EIR: https://planning.lacity.org/eir/6200WestSunset/Deir/index.html
1375 St. Andrews Project	ENV-2015-4630-EIR	1365–1375 St. Andrews Place, 5604-5632 W De Longpre Avenue, and 5605-5607 W. Fernwood Avenue, Los Angeles, CA 90028	Draft EIR: https://planning.lacity.org/eir/1375_St_Andrews_Apts/Deir/DEIR%20Website.html
Edinburgh Avenue SLS	ENV-2016-1367-EIR	750-756 North Edinburgh Avenue, Los Angeles, CA 90046	Draft EIR: https://planning.lacity.org/eir/EdinburghAve/Deir/LA%20DEIR%20Posting%20Edinburgh%20Avenue%20SLS.html
citizenM Hollywood & Vine	ENV-2016-2846-EIR	1718 N. Vine Street, Los Angeles, CA 90028	Initial Study: https://planning.lacity.org/eir/nops/citizenM_HollywoodAndVine/is.pdf
Hollywood and Wilcox Project	ENV-2016-3177-EIR	6430–6440 W. Hollywood Boulevard and 1624–1648 N. Wilcox Avenue, Los Angeles, California, 90028	Initial Study: https://planning.lacity.org/eir/nops/HwdWilcox/ls.pdf

Project Name	Env. No.	Address	Link to CEQA Document(s)
6400 Sunset	ENV-2016-3631-EIR	6400 W. Sunset Boulevard, Los Angeles, California, 90028	Initial Study: https://planning.lacity.org/eir/nops/6400Sunset/Initial_Study.pdf Sustainable Communities Project CEQA Exemption: https://planning.lacity.org/eir/SCPEs/documents/6400_Sunset_Blvd/Exemption.pdf
1360 N. Vine Street Project	ENV-2016-3778-EIR	1360 N. Vine Street, Los Angeles, California, 90028-8140	Initial Study: https://planning.lacity.org/eir/nops/1360%20Vine%20Street/InitialStudy_Checklist.pdf
5420 Sunset Project	ENV-2017-1084-EIR	5420–5450 West Sunset Boulevard, 1418–1440 North Western Avenue, and 1441 North Serrano Avenue, Los Angeles, California, 90027	Initial Study: https://planning.lacity.org/eir/nops/5420Sunset/5420%20Sunset%20Project%20Initial%20Study.pdf
Sunset Gower Studios Enhancement Plan	ENV-2017-5091-EIR	6010, 6050 and 6060 Sunset Boulevard, 1455 North Beachwood Drive, 1455 Gordon Street, and 1438 and 1440 North Gower Street, Los Angeles, CA 90028	Initial Study: https://planning.lacity.org/eir/nops/Sunset_Gower_Studios_EP/InitialStudy.pdf

The absence of data about these related projects' environmental effects undermines the accuracy of the EIR's determinations regarding the significance of the Crossroads Project's environmental effects. By omitting these 11 related projects from is discussion of the Project's environmental setting, the EIR *understates* the significance of cumulative impacts.

Furthermore, the omission of these 11 related projects is especially prejudicial because many environmental resources in the region are already severely degraded. Courts have recognized time and again that the more degraded a natural public resource has become, the greater the potential for cumulative harm from an individual project that incrementally increases the harm, and the

greater the need to reverse the past trend and protect the resource from future incremental degradation. (E.g., *Kirkorowicz v. California Coastal Com.* (2000) 83 Cal.App.4th 980, 994-995 [degraded wetlands]; *Bolsa Chica Land Trust v. Superior Court* (1999) 71 Cal.App.4th 493, 507-508 [degraded environmentally sensitive habitat area]; *Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1027-1028 [degraded urban acoustic environment]; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 721 [degraded air basin]; *Coastal Southwest*, 55 Cal.App.3d 525 at 536, 538, 542 [degraded visual setting; loss of one of the last remaining vista points for viewing oceanfront area; upholding the Commission's reversal of a local government permit for a hotel].)

c. Failure to Disclose, Evaluate, and Mitigate Impacts to Aesthetics, Views, Light/Glare, and Shading

The EIR fails to disclose that the restaurant located at 1534 N. McCadden Place is a sensitive receptor with respect to light, shade, and glare. In fact, the City's CEQA Thresholds Guide specifically identifies restaurants with outdoor dining areas as a sensitive receptor with respect to shading:

"Facilities and operations that are sensitive to the effects of shading generally include, but are not limited to, routinely useable outdoor spaces associated with residential, recreational or institutional land uses; commercial uses such as pedestrian-oriented outdoor spaces or **restaurants with outdoor eating areas**; nurseries; and existing solar collectors."

(CEQA Thresholds Guide at p. A.3-3, emphasis added.) Moreover, the EIR fails to provide easily-implementable mitigation measures to eliminate or reduce the severity of these impacts.

d. Failure to Disclose, Evaluate and Mitigate Impacts to Air Quality

For the reasons discussed below, the EIR's disclosures with respect to air quality impacts are severely deficient.

i. Failure to Disclose Effects of Project Changes to Localized Wind Patterns

As a preliminary matter, the EIR fails to disclose, analyze, or mitigate ways in which Project building designs may change localized wind patterns, such that pollutants may be directed toward or away from nearby sensitive receptors. Nor does it disclose, analyze, or assess the ways in which changed wind patterns might exacerbate CO "hot spots." (See draft EIR at p. IV.B-40.)

ii. Failure to Disclose, Analyze, or Mitigate Cumulative Impacts

The EIR claims that the Project will not contribute to cumulative considerable impacts with respect to NO₂, CO, PM₁₀, and PM_{2.5} because operational impacts, on an individual Project-level basis, would not exceed SCAQMD's thresholds. This analysis profoundly misconstrues CEQA. A project's effects can be cumulatively considerable even when project-level impacts are less than significant, viz., are "individually limited" (§ 21083 (b)(2)) or "individually minor." (Guidelines, § 15355.) The whole point of cumulative impact analysis is to ensure assessment of environmental impacts from sources that " 'appear insignificant, assuming threatening dimensions only when considered in light of the other sources with which they interact.' " (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 720.)

When viewed in conjunction with other related projects, Project air quality emissions are cumulatively considerable. For example, if you add CO emissions from the Project and the neighboring Highland Selma Project (located across the street from proposed building no. A1; related project no. 45 in the draft EIR), the combined emissions exceed SCAQMD's significance threshold:

Source	Total CO Emissions (Pounds Per Day)
Crossroads Project (EIR errata at p. 10)	403
Highland Selma Project ⁹	156.73
SCAQMD Threshold	550
Combined Total	559.73
Threshold Exceeded?	Yes

The EIR's failure to utilize a legally adequate cumulative impacts methodology and analysis is a significant error. It never should have been certified.

iii. Failure to Disclose, Analyze, or Mitigate Construction Dust and Particulate Impacts on Sensitive Receptors

First of all, the EIR fails to disclose the existence of a sensitive receptor located at 1534 N. McCadden Place. That property contains a restaurant space with an outdoor dining area of approximately 3000 square feet. Consequently, the EIR's analysis of construction impacts relies upon the false premise that "Maximum active construction activities would occur on approximately 5 acres at a distance of approximately 25 meters from sensitive land uses." (Draft EIR at p. IV.B-

⁹ Highland Selma MND at p. IV-34, available at http://clkrep.lacity.org/online/docs/2013/13-1134_misc_3_06-19-2015.pdf.

35.) In fact, the construction activities would occur at a location that is immediately adjacent to a sensitive receptor.

The EIR also completely fails to provide adequate mitigation for construction-related dust and particulate matter. It proposes, without any evidence – let alone substantial evidence – that dust control measures delineated in Section IV.B, Air Quality, of the EIR, and SCAQMD Rule 403, would be enough to mitigate the excessive dust the Project plans to emit into the already degraded air quality in the Project area. Likewise, City staff responses to our comments in the CPC staff report rely on the conclusory assumption that the dust control measures will be adequate for mitigating impacts. Again, the City has provided no basis for its assertion.

Furthermore, the EIR and the staff response completely ignore site-specific conditions that may inhibit the effectiveness of such mitigation measures, such as localized wind conditions that may direct or concentrate particulate matter at a specific location or building materials that release additional particulate matter.

To make matters worse, the proposed mitigation measures for controlling dust, such as the wetting of dirt twice a day, only propose the bare minimum required by CEQA. Common sense should tell you that on warm days (of which there are many in California), the topsoil will quickly dry out, rendering this mitigation measure completely ineffective. More frequent watering is clearly feasible, as are other more robust mitigation plans. For example, covering topsoil with plastic tarps is one possible environmentally superior alternative. Utilizing timed, remote-controlled, automatic sprinklers is yet another option. Another possibility would be to construct a physical barrier along the property line between 1534 N. McCadden Place and the Project site to control the spread of fugitive dust.

Yet another feasible, environmentally superior mitigation measure would be to eliminate the haul route along McCadden Place. The MND for the Highland Selma Project included just such a mitigation measure (at p. IV-123, emphasis added):

12-6: All construction truck traffic shall be restricted to truck routes approved by the City's Department of Building and Safety, which shall avoid residential areas *and other sensitive receptors to the extent feasible*.

This will mitigate impacts to the sensitive receptors along McCadden place by preventing exposure to air pollutants from idling trucks that are queuing along the haul route, and it will also mitigate exposure to fugitive dust from trucks carrying dirt and other materials.¹⁰ It may also mitigate

¹⁰ The EIR assumes that trucks will not idle for more than five minutes at a time. (Draft EIR at p. IV.B-16.) However, it is widely accepted that trucks rarely comply with idling restrictions, and recent research has found that it is not uncommon for truckers to idle for several hours every day. (United States Office of

ancillary traffic and noise impacts caused by queuing trucks that will block the single lane of traffic on McCadden Place during the Project's construction phase.

e. Failure to Disclose, Evaluate and Mitigate Impacts to Biological Resources

The EIR did not analyze impacts to biological resources because the Project's Initial Study (IS) (erroneously) determined that Project would not have the potential to cause significant impacts related to biological resources. (Draft EIR at p. I-2.) The EIR's failure to disclose, analyze, and mitigate impacts to biological resources is a serious flaw.

i. Failure to Disclose, Evaluate, and Mitigate Impacts Caused by Removal of Trees

According to the protected tree report attached to the Project's IS as "appendix IS-1," the project will remove 59 of the 71 trees located on the project site, as well as "many" of the 18 street trees located along the perimeter of the Project site. Once the Project is completed, the project will provide a total of 246 trees (see draft EIR at p. IV.K.5-19), but the EIR completely overlooks environmental impacts that will occur during the lengthy construction period as a result of cutting down the vast majority of trees on site (i.e., the years-long period between the trees' removal and the planting of new trees). Even if these impacts could in good faith be called "temporary," or "short-term," which they cannot, this does not permit the city to decline to assess them. (See *No Oil, Inc. v. Los Angeles* (1974) 13 Cal.3d 68, 85.)

The loss of the 59 (or more) trees will exacerbate the heat island effect, it will diminish the urban forest's capacity to absorb airborne pollutants, and it will result in the loss of habitat for urban wildlife. It will also add to the significant, cumulative, neighborhood-wide and City-wide loss of canopy cover.¹¹ The EIR does not disclose these impacts. Nor does it disclose potential impacts

Energy Efficiency and Renewable Energy, *Work Truck Daily Idle Time by Industry*, available at <https://www.energy.gov/eere/vehicles/fact-917-march-21-2016-work-truck-daily-idle-time-industry>.)

¹¹ According to one recent study, between the years 2000 and 2009, Council District 13 lost nearly 20 percent of its canopy cover, and hardscape increased by nearly 20 percent. (Lee, et al., *Increased home size and hardscape decreases urban forest cover in Los Angeles County's single-family residential neighborhoods* (2017) 24 Urban Forestry & Urban Greening 222, available at <http://johnwilson.usc.edu/wp-content/uploads/2018/03/Increased-home-size-and-hardscape-decreases-urban-forest-cover-in-Los-Angeles-Countys-single-family-residential-neighborhoods.pdf>.)

associated with replacing large, mature trees with potentially small, immature trees.¹² Depending on the species, it may take decades for the new trees to mature.¹³

To make matters worse, the EIR does not provide a landscape plan for the 176 trees that will purportedly be planted on the roof deck. (See draft EIR at p. IV.K.5-19.) There is no way for the public or City decisionmakers to scrutinize whether it will be possible to place that many trees on the deck, whether the trees will have enough space to thrive, or whether tree growth may be inhibited by other environmental factors, such as strong winds on the top of the building.

ii. Failure to Disclose Impacts Caused by Bird Collisions with Buildings

Research indicates that collisions with clear and reflective sheet glass cause more anthropogenic bird deaths than any other activity, except habitat destruction.¹⁴ The City anticipates that migratory birds may nest in trees located throughout the Project site, but the EIR provides no discussion whatsoever about potential collisions between these migratory birds and the tall, unobstructed towers at the project site.

iii. Failure to Disclose Indirect and Cumulative Impacts to Biological Resources

The EIR does not disclose or analyze (much less mitigate) indirect and cumulative Project impacts on biological resources caused by project effects on other aspects of the environment (e.g., impacts to regional air quality, contributions to urban sprawl caused by population and housing displacement, contributions to regional light pollution, etc.).¹⁵

¹² Large, mature trees provide ecological services that smaller, immature trees do not. (See United States Forest Service Center for Urban Forest Research, *The Large Tree Argument*, available at https://www.fs.fed.us/psw/topics/urban_forestry/products/cufr_511_large_tree_argument.pdf.)

¹³ Bowman et al., *Detecting trends in tree growth: not so simple* (2013) 18 trends in Plant Science 11, available at http://www.t-forces.net/upload/publication-store/2013/Bowman/Bowman_et_al_tree_growth_trends_TPS_2013.pdf; see also Black et al., *Relationships between radial growth rates and lifespan within North American tree species* (2008) 15 *Ecoscience* 349, available at <http://www.bioone.org/doi/full/10.2980/15-3-3149>.

¹⁴ Klem Jr., et al., *Architectural and Landscape Risk Factors Associated with Bird-Glass Collisions in an Urban Environment*, 127 *J. Field Ornithol.* 76(2):127–133, 2005, available at https://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Klem-glassCollisionRiskFactors-WJO-2009.pdf.

¹⁵ For example, airborne pollutants can potentially disrupt the endocrine systems of local wildlife. (See Colborn, et al., *Developmental Effects of Endocrine-Disrupting Chemicals in Wildlife and Humans*, available at <https://ehp.niehs.nih.gov/doi/pdf/10.1289/ehp.93101378>.)

f. Failure to Disclose, Evaluate and Mitigate Project Contributions to Climate Change, Including Greenhouse Gas Emissions

The EIR fails to disclose, analyze, or mitigate several key issues with respect to Project GHG emissions and contributions to climate change. First of all, the EIR fails to disclose or analyze (much less mitigate) the ways in the albedo of ground-level and rooftop surfaces will contribute to climate change.¹⁶ Nor does the EIR disclose how landscaping features will impact albedo at the Project site.

Second, the EIR's decision to amortize construction GHG emission impacts over a 30-year period fails to account for the immediate impact that those emissions will have. (See draft EIR at p. IV.C-45.) Even though the practice of amortizing GHG emissions is purportedly recommended by the SCAQMD, this practice conflicts with the duty of lead agencies to provide meaningful information about the immediate effect of emitting large quantities of GHG emissions during the construction phase of the project. (See CEQA § 21002.1, subd. (e).)

Third, the disclosures of direct, indirect, and cumulative impacts with respect to GHG emissions fail to account for GHG emissions that occur during the manufacturing and distribution processes for products that are sold at retail establishments at the project site. Nor does it account for GHG emissions that occur while producing and transporting food products used in bars, restaurants, and hotel facilities. The failure to include these sources of GHG emissions severely understates the significance of the Project's environmental impacts.

g. Failure to Disclose, Evaluate and Mitigate Project Impacts on Human Health

When disclosing and assessing a project's environmental effects, an EIR must also assess "human health and safety." (*California Building Industry Assn. v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 386; § 21083 (b)(3); see *San Lorenzo Valley Community Advocates for Responsible Education v. San Lorenzo Valley Unified School Dist.* (2006) 139 Cal.App.4th 1356, 1372 [human health is among the many "environmental values" protected by CEQA and the Guidelines].)

In our discussion of population and housing impacts, we will show that the displacement of human beings causes direct, indirect, and cumulative adverse impacts on human health. But the Project also has the potential to adversely affect human health in other ways. Some examples include (but are not limited to) the following – none of these potential impacts were disclosed or analyzed in the EIR (much less mitigated):

¹⁶ See Winton, *Amplified Arctic climate change: What does surface albedo feedback have to do with it?* (2006) 33 *Geophysical Research Letters* 1, available at, <https://agupubs.onlinelibrary.wiley.com/doi/epdf/10.1029/2005GL025244>.

- Whether the creation of large gathering spaces or entertainment venues will facilitate the transmission of communicable diseases, thereby increasing the risk for potential pandemics in the region.
- Whether the vegetation at the Project site could potentially serve as habitat for vermin or insects that act as disease vectors in the region.
- Whether the concentration of 22 venues with alcohol licenses on the Project site will lead to adverse human health impacts by increasing the prevalence of violent crime in the neighborhood.
- Whether traffic conflict between vehicles, pedestrians, bicycles, or other shared mobility devices create an unacceptable risk of injury.
- Whether the potential placement of shared mobility devices on sidewalks and other public spaces creates an unacceptable risk of injury.
- Whether the potential pollutant discharges into the underlying groundwater basin could adversely affect human health in the region.
- Whether (and the extent to which) Project traffic and circulation impacts may adversely affect the human health of drivers who are forced to spend more time in their cars while driving through Hollywood.
- Whether (and the extent to which) Project noise and vibration impacts may adversely affect the health of residents in the surrounding neighborhood.
- Whether (and the extent to which) light pollution from the project site may adversely affect human health.

Additionally, "CEQA calls upon an agency to evaluate existing conditions in order to assess whether a project could exacerbate hazards that are already present." (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 388.) The EIR fails to disclose, analyze, or mitigate the ways in which Project impacts could exacerbate conditions on the Project site that adversely affect human health, such as increased ambient levels of airborne pollutants.

h. Failure to Disclose, Evaluate and Mitigate Project Impacts on Hydrology and Water Quality

In its analysis of impacts to groundwater, the EIR notes that the Project overlies the Hollywood Subbasin, which is part of the Los Angeles Coastal Plain Groundwater Basin. (Draft EIR at pp. IV.G-22 to IV.G-23.) This groundwater basin is hydrologically connected to Ballona Creek, a navigable Public Trust surface waterway.¹⁷

¹⁷ See California Department of Water Resources, Groundwater Bulletin 118: Coastal Plain of Los Angeles Groundwater Basin, Hollywood Subbasin (2004), available at <https://water.ca.gov/LegacyFiles/groundwater/bulletin118/basindescriptions/4-11.02.pdf> [noting connection

In August 2018, the Court of Appeal held in *Environmental Law Foundation v. State Water Resources Control Bd.* that Public Trust protections extend to groundwater that is hydrologically connected to Public Trust surface waters, and trustees of Public Trust groundwater have a legal duty to prevent adverse impacts to groundwater that will also adversely affect Public Trust surface water. (26 Cal.App.5th 844, 859.) Therefore, if Project impacts to groundwater lead to adverse effects on Public Trust surface waters (e.g. by excessive dewatering or by contaminating groundwater), the City will have violated its obligations as a trustee of a Public Trust resource. (See *Ibid*; see also *Nat'l Audubon Soc'y v. Superior Court* (1983) 33 Cal.3d 419, 441 [The Public Trust Doctrine "is an affirmation of the duty of the state to protect the people's common heritage of streams, lakes, marshlands and tidelands"].)

The EIR admits that excavation during the construction phase (which will go as deep as 78 feet below the natural grade) may require dewatering or "other withdrawals of groundwater." (Draft EIR at pp. IV.G-31 to IV.G-32.) The EIR does not disclose how much groundwater could be withdrawn from the aquifer in a worst-case-scenario, or how this might affect Public Trust surface waters.¹⁸ Furthermore, the EIR does not disclose how the use of pervious materials at the Project site might indirectly affect Public Trust surface waters by inhibiting groundwater basin recharge. (See draft EIR at p. IV.G-38.) The EIR also admits that hazardous materials used during construction and leaks from fuel storage tanks located onsite might adversely affect groundwater quality. (Draft EIR at pp. IV.G-32 to IV.G-33; IV.G-39.) The EIR does not disclose potential adverse effects on Public Trust surface waters caused by groundwater contamination at the Project site.

In summary, the EIR should have disclosed, analyzed, and mitigated any Project activities that conflict with the City's Public Trust obligations. Its failure to do so is a serious error.

i. Failure to Disclose, Evaluate and Mitigate Project Impacts with Respect to Land Use, Including General Plan Consistency

An "EIR shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans." (CEQA Guidelines, § 15125, subd. (d).) Here, the EIR fails to adequately disclose, analyze, or mitigate project inconsistencies with respect to City and State land use policies, including elements of the General Plan.

"[T]he requirement of consistency is the linchpin of California's land use and development laws. It is the principle which infused the concept of planned growth with the force of law." (*Debottari v. City*

to Ballona Creek]; U.S. Army Corps of Engineers, *Navigable Waters in Los Angeles District*, available at <https://www.spl.usace.army.mil/Missions/Regulatory/Jurisdictional-Determination/Navigable-Waterways/> [identifying Ballona Creek as a navigable waterway].

¹⁸ Nor does the EIR disclose, analyze, or mitigate the Project's effects on *cumulative* overdraft of the Hollywood Subbasin or the Los Angeles Coastal Plain Groundwater Basin.

of Norco (1985) 171 Cal.App.3d 1204, 1213.) Our high court thus articulated the hierarchical consistency principle in *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553: “[T]he keystone of regional planning is consistency – between the general plan, its internal elements, subordinate ordinances, and all derivative land-use decisions. [Citations.]” (*Id.* at 572-573; see Gov. Code, § 65567; *Neighborhood Action Group v. County of Calaveras* (1984) 156 Cal.App.3d 1176, 1184 [“permit action taken without compliance with the hierarchy of land use laws is ultra vires as to any defect implicated by the uses sought by the permit”]; *Save El Toro Assn. v. Days* (1977) 74 Cal.App.3d 64, 73 [“without an inventory of available open space resources there cannot be a plan as contemplated by the Open Space Lands Act – only isolated uncoordinated projects – the type of development the act was specifically intended to prevent”].)

i. Failure to Disclose Inconsistencies with the Hollywood Redevelopment Plan

The Project must be consistent with the Hollywood redevelopment plan. The EIR asserts that the “Findings are consistent with the Redevelopment Plan” at page 1-18 of the Executive Summary. Not so. This project does not meet Hollywood Redevelopment Plan goals (1), (3), (4), (5b), (5g), (7g), (9), (10), (11), (12), (13), (14), (15), and (16).

These Hollywood redevelopment plan goals include:

“1) Encourage the involvement and participation of residents, business persons, property owners, and community organizations in the redevelopment of the community.

“3) Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.

“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.

“5) Improve the quality of the environment, promote a positive image for Hollywood and provide a safe environment through mechanisms such as:

“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;

“g) promoting rehabilitation and restoration guidelines;

"h) integrate public safety concerns into planning efforts.

"7) Promote the development of Hollywood Boulevard within the Hollywood commercial core as a unique place which:

"g) recognizes and reinforces its history and architecture.

"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.

"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.

"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.

"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 *servicing existing facilities and meeting future needs*.

"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.

"14) Promote and encourage development of recreational and cultural facilities and open spaces necessary to support attractive residential neighborhoods and commercial centers.

"15) Promote the development of the *varied ethnic communities in Hollywood*.

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 Project is blatantly inconsistent with the redevelopment plan that requires 30% of all new housing construction be reserved for “affordable” and 14% of that for “very low income.” The Project does not meet mandated housing targets. The Project also does not include enough parking and projected growth needs for automobile and parking usage as is required by the Hollywood Redevelopment Plan. The Project Objectives section offers no discussion or substantial evidence supporting Population, Households, Jobs, Affordability, and Traffic projections for existing 2040 General and Hollywood Community Plans (Future Setting without Project) and for Plans plus the Project.

HMC raised these inadequacies in their comments to the CPC. In response, City staff imply argued that “a project does not need to be in perfect conformity with each and every policy.” (Staff Response 2-14.) While it is true that an EIR must look holistically at General Plan compliance, that does not mean that the EIR can ignore large-scale inconsistencies between a project and *many* policies of the general plan. As we have shown, the EIR does not live up to this well-established standard.

ii. Failure to Disclose Inconsistencies with the Hollywood Community Plan

The EIR ignores numerous inconsistencies between the Project and the Hollywood Community Plan. These have been pointed out by many other commentators throughout the EIR review process, and we hereby adopt their arguments by reference. The comments that show the Project is not consistent with the scale and character of the surrounding community are especially relevant.

Furthermore, there is no economic setting and assessment of 2040 growth of the City and for the Hollywood Community Plan. In fact, the City here rushes the Project to approval before approval of the Hollywood Community Plan Update now undergoing public review, contrary to the fundamental planning rule that “[t]he tail does not wag the dog.” (*Leshar Communications, Inc. v. City of Walnut Creek* (1990) 52 Cal.3d 531, 541.) If “[t]he general plan is the charter to which [an] ordinance must conform” (*ibid.*), then the general plan most certainly is the charter to which an individual project must conform.”

iii. Failure to Disclose Inconsistencies with the Plan for a Healthy Los Angeles

The City recently adopted the *Plan for a Healthy Los Angeles* as an element of the City’s General Plan.¹⁹ The EIR here fails to disclose inconsistencies with several of the new plan’s key policies.

¹⁹ The *Plan for a Healthy Los Angeles* is available at:
<https://planning.lacity.org/cwd/gnlpln/PlanforHealthyLA.pdf>.

Policy 1.7 -- Displacement and Health (p. 32): This policy calls for “expanding and preserving existing housing opportunities available to low-income residents; preserving cultural and social resources; and creating and implementing tools to evaluate and mitigate the potential displacement caused by large-scale investment and development.” The EIR fails to disclose the inconsistency of the permanent loss of 82 RSO units, and the two-year gap between eviction and construction of new housing, with this fundamental environmental justice policy. “ ‘[E]nvironmental justice’ means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” (Gov. Code, § 65040.12, subd. (e).) At the local level, environmental justice means fairness in the distribution of environmental benefits and burdens. (California Department of Justice entitled, “Environmental Justice at the Local and Regional Level: Legal Background” (July 10, 2012).) The Plan for a Healthy Los Angeles seeks to achieve just that. The project does not.

Policy 2.2 -- Healthy Building Design and Construction (p. 42): This policy calls for facilitating and increasing “positive psychological and social experiences” with the built environment. The EIR fails to disclose the fact that the project’s significant environmental impacts (e.g., to traffic, parking, noise, and air pollution) are incompatible with this policy; they significantly obstruct positive psychological and social experiences.

Policy 5.1 -- Air Pollution and Respiratory Health (p. 88): This policy calls for “[R]educ[ing] air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.” The Project’s significant impacts to air quality -- including regional operational emissions of volatile organic compounds, nitrous oxide, and carbon monoxide that exceed established SCAQMD thresholds -- cannot possibly be found compatible with this policy. The EIR, again, fails to disclose this inconsistency.

HMC identified these inconsistencies (and the EIR’s failure to disclose them) in its appeal to the CPC. In response, City staff simply offered the conclusory remark that “[t]he Draft EIR does assess the Project’s consistency with the General Plan’s Health and Wellness Element in Section IV.H.” (Response 2-15.) This staff completely misses the point that the EIR failed to identify inconsistencies and only assumes that the Project will not adversely affect human health or wellbeing. HMC’s comments are substantial evidence showing that the Project’s significant, adverse environmental impacts are conditions that are inherently inconsistent with the policies of the *Plan for a Healthy Los Angeles* cited above.

j. Failure to Disclose, Evaluate and Mitigate Noise Impacts

The EIR's disclosures and analyses of noise and vibration impacts are severely deficient. Likewise, the mitigation measures proposed in the EIR are completely inadequate.

i. Third-party Expert Analysis Has Found the EIR to Be Inadequate

We have retained a noise expert to review the adequacy of the EIR and the noise study that was prepared by the City's noise consultant, Acoustical Engineering Services (AES). After conducting a preliminary review, our expert consultant informed us that the AES noise study does not adequately address anticipated noise impacts associated with the Project, and the noise study should be revised to reflect a more realistic representation of anticipated noise impacts from the Project. Specifically, our expert identified the following deficiencies:

- The construction noise analysis understates the adverse noise impacts associated with the construction of a project of this magnitude. Noise associated with dump trucks and materials delivery trucks has not been incorporated into the noise analysis, and it is anticipated that there will be additional equipment used during construction of the project than what is shown in the noise analysis (additional concrete trucks and other equipment are expected, based on the scale of the project).
- Regarding the analysis of operational noise from the proposed project, the noise study assumes that persons located in outdoor gathering areas will use "raised" voices. While this may be an appropriate assumption for the majority of outdoor gathering areas, it is not representative of the anticipated noise levels that will occur in the Main Pool Deck at the Upper Podium, Roof Deck Lounge and Pool, and Roof Deck on Parcel A, as well as the Pedestrian Paseo (ground level) on Parcel B, and the Pedestrian Paseo (ground level) and Crossroads on Parcel C. Due to the large crowds expected in these areas, as well as the proposed use of amplified music in these areas, it is expected that persons gathered in these areas will most likely use a combination of loud and shouted voices in order to be heard over the amplified music, and other persons.

Our expert informed us that after a preliminary review of the noise study prepared for the Project, several potentially significant issues have been discovered that warrant further revisions to the noise study, in order to determine whether additional potential impacts were overlooked or understated, and to what extent. It should be noted that these issues have been discovered after only a preliminary review of the noise study for the Project, and that additional issues with the noise study are expected to be discovered upon a more thorough review.

ii. Failure to Adequately Measure and Disclose Baseline Roadway Noise

The EIR does not provide real-world measurements of existing noise levels at offsite roadway segments. Instead, it uses the Federal highway Administration's Traffic Noise Model Software Version 2.5 (FHWA TNM 2.5) to estimate baseline conditions. But research by Shu et al. (2007) has shown that FHWA TNM 2.5 over-predicts the absolute noise levels by an average error of 2.0 dBA compared to field measurements.²⁰ A report prepared by Hankard et al. (2006) for the Colorado Department of Transportation (CDOT) also criticized the reliability of FHWA TNM 2.5: "The routine that predicts the location of noise level contours in TNM is cumbersome, error-prone, and does not agree with predictions at individual locations. It should not be used to determine impacts on CDOT projects."²¹ Without accurate baseline data, the EIR will not be able to inform the public and City decisionmakers about the full scope and severity of construction and operational noise impacts.²²

Obtaining accurate measurements of existing baseline conditions is especially important because the EIR shows that the net increase in roadway noise is very close to exceeding the Community Noise Equivalent Level (CNEL) threshold of significance, which states that a significant impact would occur if sensitive receptors are exposed to an increase of at least 3-dBA compared to existing conditions. (Draft EIR at p. IV.I-53.) On McCadden Place (between Sunset Boulevard and Selma Avenue), where several sensitive receptors are located, the EIR projects an increase of 2.8-dBA compared to existing conditions. (Draft EIR at p. IV.I-60 [existing plus project conditions].) At the very least, the city's noise consultants should recalculate anticipated roadway noise impacts using alternative (reliable) modeling software to confirm whether the Project's impacts fall below the 3-dBA CNEL threshold of significance.

iii. Failure to Disclose, Analyze, and Mitigate Impacts to Sensitive Receptors Located Adjacent to the Project Site

In its comments to the CPC as well as a prior letter to the Department of City Planning (dated June 12, 2017), HMC advised the City that the EIR ignores sensitive receptors immediately adjacent to the Project site. Omitted sensitive receptors include (but are not limited to):

²⁰ Shu et al., *Comparative evaluation of the ground reflection algorithm in FHWA Traffic Noise Model (TNM 2.5)* (November–December 2007) 68 *Applied Acoustics* 1459.

²¹ Hankard et al., Colorado Dept. of Transportation Final Report No. CDOT-2005-21: *Evaluation of the FHWA Traffic Noise Model (TNM) for Highway Traffic Noise Prediction in the State of Colorado* (2006), p. 79.

²² By relying on computer models instead of real-world measurements, the EIR also fails to account for site-specific conditions that may amplify or soften ambient noise (e.g. neighboring buildings that reflect sound waves).

- The recording studio located at 1540 N. McCadden Place, which provides services for both indoor and outdoor live and delayed broadcast production.
- The restaurant located at 1534 N. McCadden Place, with hours from 8am to 2am with a large outdoor patio abutting the construction.
- The Kings Los Angeles language school located at 1555 Cassil Place.
- Multiple facilities at the Musicians' Institute, located at 6752 Hollywood Boulevard; its campus includes recording studios, classrooms, and performance halls.

In response to HMC's comments regarding the sensitive receptors at 1534 and 1540 N. McCadden, City staff wrote: "As commercial uses, the HMC properties are not considered to be noise-, vibration-, light- or air quality-sensitive receptors." (CPC staff report for VTT-73568-1A [Response 2-10].)²³ The City's response makes no sense. The *L.A. CEQA Thresholds Guide's* definition of sensitive receptors does not distinguish between commercial and non-commercial sensitive receptors. (*L.A. CEQA Thresholds Guide* at p. I.1-3; draft EIR at p. IV.I-10.) The definition of noise-sensitive land uses in the Noise Element of the General Plan also does not distinguish between commercial and non-commercial sensitive receptors. (*Noise Element, City of Los Angeles General Plan*, Chapter IV, p. 4-1; draft EIR at pp. IV.I-10 to IV.I-11.)

In CEQA documents for other projects in Hollywood, the City has identified commercial recording studios as sensitive receptors. In the mitigated negative declaration (MND) for the Highland Selma Project (related project no. 45; see draft EIR at p. III-11 and III-20), which is located across the street from the Crossroads Project, the city identified the Musicians Institute and nearby recording studios as sensitive receptors. (Highland Selma MND at p. IV-121, available at <http://clkrep.lacity.org/onlinedocs/2013/13-1134_misc_3_06-19-2015.pdf>.) Likewise, the Millennium Project EIR identified Capitol Records' recording studios as a sensitive receptor (no. 17 in the map on the following page, which is reproduced from the Millennium project's draft EIR).²⁴

Despite the presence of a performance venue and sound recording/editing studios being located contiguously to the proposed construction site, the EIR and Vesting Tentative Tract Map approval fail to recognize the subject properties as sound sensitive and fail to even assess Project generated noise levels at these locations.

²³ Staff also wrote: "The HMC properties are not considered to be either noise- or vibration-sensitive; therefore, Project generated noise and vibration levels at these locations were not assessed or mitigated, and mitigation measures NOI-MM-1 and NOI-MM-2 are not required to include the HMC properties within the scope of their protections." (*Ibid.*)

²⁴ Figure IV.H-1, available at http://cityplanning.lacity.org/eir/Millennium%20Hollywood%20Project/DEIR/DEIR%20Sections/Millennium%20Hollywood%20DEIR_Volume%201_COMPILED.pdf

Map of Sensitive Receptors Identified in the Millennium Project EIR:



The developer excuses the lack of any attempt to mitigate such impacts because they believe the Project noise levels will be temporary. However, the projected construction time of 5 to 7 years is not “temporary” by any stretch of the imagination, especially since heavy equipment is proposed to be driving down McCadden at all hours of the day creating noise and vibrations. The minimal proposed mitigation measures are wholly inadequate. With regard to vibrations and potential land related issues, the City should require shoring for any excavation done adjacent to the Subject Properties, and any approval should specifically identify the 1534 and 1540 N. McCadden side and rear property in order to protect them from any grading earth related impacts.

Although the City plans to construct temporary impermeable sound barriers at a number of locations along the perimeter of the project site (see NOI-MM-1), it does not plan to install a

temporary barrier between the Project site and the Subject Properties. It would be very easy to do so. However, if the City does plan to use temporary barriers to mitigate noise and vibration impacts, they must be at an appropriate height. The EIR proposes that 12-foot high barriers would be sufficient (draft EIR at p. IV.I-84), but the City's noise consultant, AES, pointed out in a comment letter on the Ivar Gardens project that a single 16-foot high barrier designed to protect the Los Angeles Film School from noise impacts was insufficient, and a second 10-foot barrier should also be installed to mitigate impacts. AES should follow its own advice for the Crossroads Project and use similar standards when proposing temporary sound barriers.²⁵

k. Failure to Disclose, Evaluate and Mitigate Population and Housing Displacement Impacts

As shown in further detail below, the EIR fails to adequately disclose, assess, or mitigate impacts with respect to population and housing displacement.

The project will permanently remove from the housing market 82 residential units subject to the City's Rent Control Ordinance (RSO).²⁶ Although it states that 905 units will be built as part of the project, only 105 units are said to replace the units covered by the RSO. The EIR disclosure, assessment and mitigation of the project's substantially adverse direct and cumulative effects on human beings -- low-income tenants already disparately impacted by the loss of rent-controlled housing in Hollywood and the city -- is woefully inadequate and violates CEQA. (CEQA Guidelines, § 15065, subd. (a)(4).)

i. Failure to disclose, assess, and mitigate displacement of housing and people during construction

According to the EIR, construction is expected to last "approximately" 48 months, though in reality, it could last seven years or longer. (See DEIR, Executive Summary, p. I-17.) That means there will be a gap of *at least* four years between (1) the time tenants are evicted from the existing 82 rent-stabilized units on site and (2) the time that new units at the project site enter the housing market. The EIR does not disclose or assess (much less mitigate) how the lag time between displacement and the availability of new units will impact the City's severely depleted supply of affordable housing. (DEIR, Housing Impacts, pp. IV.J.2-13 to 2-14 [construction-related housing impacts]; DEIR, Population Impacts, pp. IV.J.3-6 to 3-16 [construction-related population impacts].)²⁷ At the very least, the developer and the City should mitigate these displacement impacts by providing

²⁵ AES Comment letter on Ivar Gardens Project, available at http://clkrep.lacity.org/online/docs/2017/17-0029_misc_08-01-2017.pdf.

²⁶ According to the EIR 84 RSO units exist on site.

²⁷ See City of Los Angeles Housing Needs Assessment, available at <https://planning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf>.

interim housing while the current residents at the Project site wait for new housing to become available.

ii. Failure to disclose, assess, and mitigate the permanent loss of rent-stabilized units on site and compliance with the RSO

The project will bulldoze 82 units that are currently subject to the RSO. The EIR does not definitely disclose whether the new housing to be constructed on-site will also be subject to the RSO, but implies it will not be. Subsequent City reports confirmed that they will not be subject to the RSO. The FEIR's global response to comments regarding the RSO states (FEIR pp. II-23 to II-24):

“[S]ince the Applicant is removing current RSO units from the market, the Applicant can either apply the RSO to all new Project rental units, or, as an alternative, can provide replacement covenanted affordable units on-site. In order to comply with the regulations applicable to the Project, it would have to include 82 affordable units for very low income households with an annual income at or below 50 percent of the Area Median Income, as established by the California Department of Housing and Community Development. However, the Modified Project would provide 105 affordable units for very low income households.”

The EIR misleadingly suggests that replacing the 82 RSO units with 105 affordable replacement units will be sufficient to replace existing rent-stabilized housing, but it completely ignores the fact that by replacing RSO units with covenanted affordable units, it is replacing apples with oranges. The two cannot be compared. The EIR hints at the fact that there is a “distinction between RSO units and affordable housing” (FEIR, p. II-24), but the EIR does not disclose, assess, or mitigate population and housing impacts caused by replacing RSO units with affordable units that will lose their affordability restrictions in 55 years (see FEIR, p. II-23 [noting that affordability covenants need only last 55 years].) The EIR does not disclose, assess, or mitigate impacts that will occur when the restrictions expire.

Nor does the EIR adequately assess, disclose, or mitigate the Project's cumulative contributions to the ongoing depletion of the City's RSO stock. It does not analyze how this project contributes to City-wide trends.

iii. Failure to disclose, assess, and mitigate the permanent loss of rent-stabilized units on site and compliance with the RSO

The EIR failed to adequately disclose, analyze, or mitigate adverse human health impacts associated with housing displacement. These adverse health effects include:

- Overcrowding in replacement housing
- Increased susceptibility to communicable diseases

- Increased susceptibility to chronic diseases, and indirect health impacts caused by stress and anxiety
- Lack of access to safe drinking water and hot water for washing
- Lack of effective waste disposal (allowing for intrusion of disease vectors)
- Inadequate food storage
- Food insecurity (when housing is unaffordable, people often sacrifice other material needs including food, clothing, and health care services)
- Increased susceptibility to mental illness
- Impediments to development in children and adolescents

The City has provided no evidence whatsoever, much less substantial evidence, to show that residents who will be displaced from their homes will not suffer these adverse health impacts. (See *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 734 [significant impact caused by noise from temporary events at winery estate located near wildlife habitat established by studies indicating that noise may induce stress-related illness in mountain lions and bobcats, and their displacement from favored habitats].)

At the very least, the EIR should adopt the mitigation recommendations for housing and population displacement in the City's CEQA Thresholds Guide, and the City should remove the expiration dates for the affordability covenants to ensure that the City permanently retains a stable quantity of housing that will be affordable to the majority of Angelenos.

I. Failure to Disclose, Evaluate and Mitigate Impacts to Public Safety, Including Impacts to Police and Fire Services

As noted above, the Project will include 22 "alcohol-related uses." But the EIR completely fails to disclose where they will be located, or the nature of the establishments that will utilize them. Nor does the EIR disclose impacts of such a high concentration of alcohol-related uses on public safety, or the need for police and fire services. The EIR does not disclose or analyze whether existing community emergency resources (including police and fire staff) will be sufficient serve the large quantity of guests that will frequent the bars, restaurants, and nightclubs on site. Furthermore, the EIR does not disclose, assess, or mitigate the extent to which the closing times of these establishments will affect public safety or the demand for public safety services. Consequently, the EIR does not inform us whether potentially significant demands can be mitigated by adjusting closing times.

The EIR does not provide any realistic mitigation to address the high-demand for public safety services that the Project will generate. It does not guarantee that security, police, or fire staff will be able to respond to the Project site, or how many will be stationed in the neighborhood at any given time. Additionally, the EIR does not disclose, assess, or mitigate potential impacts caused by placing "alcohol-related uses" in close proximity to schools and churches.

Finally, the EIR fails to disclose how traffic and circulation impacts will affect the ability of police and firefighters to respond to emergencies at the Project site in a timely manner. If the surrounding streets are clogged with traffic, it is unlikely that emergency responders will be able respond to emergencies in a sufficient period of time.

m. Failure to Disclose, Evaluate and Mitigate Traffic Impacts

The EIR's disclosures, analysis, and proposed mitigation measures for traffic and circulation impacts are severely inadequate.

i. Failure to Adequately Estimate Future Trips Generated by the 22 "Alcohol-related Uses" at the Project

The EIR's trip generation projections does not specifically list trips associated with the 22 venues that will serve alcohol (eight of which will include live entertainment), but we assume they are included in the "High Turnover Restaurant" category of uses (ITE Code 932). Based on the Institute of Transportation Engineers' (ITE) trip generation figures (9th Ed.), the EIR estimates that all high-turnover restaurants on site will generate 2,315 daily trips (2,572 trips minus 257 trips eliminated through TDM program). (See traffic study in EIR errata at Table 4; see also Table IV.L-22 at p. IV.L-134 in the draft EIR's traffic chapter; see also Table IV.L-10 at p. IV.L-56.) These projections likely underestimate the number of trips to and from the new bars and nightclubs, which regularly attract hundreds of patrons each night. For example, on one night in 2012, City fire inspectors found more than 1,000 customers inside the Hollywood Supper Club.²⁸

ii. Failure to Adequately Disclose Cumulative Impacts

Of the 11 undisclosed related projects that were omitted from the Project's EIR (see Part XX, *ante*), City CEQA records show that five of those projects generate a combined total of 4,771 daily trips. Those five projects are listed on the chart on the following page:

²⁸ See Walton, *Hollywood's wild nightclub scene brings crackdown from city*, available at <http://www.latimes.com/local/california/la-me-hollywood-nightclubs-20151019-story.html>.

Project Name	Project Address	Number of New Trips Generated	Source
SunWest Project (ENV-2015-2448-EIR)	5509, 5511, 5515, 5517, 5519, 5521, 5523, 5525, 5527, 5529 West Sunset Boulevard; 1505, 1507, 1509, 1511, 1515, 1523, 1525, 1527, 1529, 1531, 1535 North Western Avenue; and 5518 West Harold Way, Los Angeles, California, 90028	2,562 Net New Daily Trips	See supplemental traffic study at p. 16, available at https://planning.lacity.org/eir/SunWest/FEIR/FEIR%20Appendices/SunWest%20FEIR%20Appendices_Compiled.pdf
6200 West Sunset Boulevard Project (ENV-2015-3603-EIR)	6200–6218 W. Sunset Boulevard, 1437–1441 N. El Centro Avenue, 6211 W. Leland Way, Los Angeles, California 90028	1,243 Net New Daily Trips	EIR Traffic Chapter at p. 28, available at https://planning.lacity.org/eir/6200WestSunset/DEIR/files/D_IVJ.pdf
1375 St. Andrews Project (ENV-2015-4630-EIR)	1365–1375 St. Andrews Place, 5604–5632 W De Longpre Avenue, and 5605–5607 W. Fernwood Avenue, Los Angeles, CA 90028	800 Net New Daily Trips	EIR Traffic Chapter at p. 35, available at https://planning.lacity.org/eir/1375_St_Andrews_Apts/Deir/DEIR%20Sections/IV.L%20Traffic%20(1375%20St%20Andrews)%20Public%20Review.pdf
Coronel Apartment Project (ENV-2012-110-EIR)	1600-1608 N. Serrano Ave. & 1601-1605 N. Hobart Boulevard, Los Angeles, CA 90027	143 Net New Daily Trips	Traffic Assessment at p. 2, available at http://planning.lacity.org/eir/CoronelApt/DEIR/assets/Appendix%20G_Traffic%20Assessment.pdf
Edinburgh Avenue SLS (ENV-2016-1367-EIR)	750-756 North Edinburgh Avenue, Los Angeles, CA 90046	23 Net New Daily Trips	EIR Traffic Chapter at p. 13, available at https://planning.lacity.org/eir/EdinburghAve/Deir/IV.E%20Transportation%20and%20Traffic.pdf

These new daily trips were not studied in the Project's analysis of cumulative, regional traffic impacts. Additionally, the EIR does not account for cumulative, regional traffic impacts from six other undisclosed related projects that have not undergone EIR review. However, the initial studies for all six of those projects state: "Implementation of the Project has the potential to generate additional vehicle trips, which could potentially add more than 50 trips to a CMP roadway intersection or more than 150 trips to a CMP freeway segment." Those six projects are:

Project Name	Project Address	Source
citizenM Hollywood & Vine (ENV-2016-2846-EIR)	1718 N. Vine Street, Los Angeles, CA 90028	Initial Study at p. B-42, available at https://planning.lacity.org/eir/nops/citizenM_HollywoodAndVine/initial_study.pdf
Hollywood and Wilcox Project (ENV-2016-3177-EIR)	6430–6440 W. Hollywood Boulevard and 1624–1648 N. Wilcox Avenue, Los Angeles, California, 90028	Initial Study at p. B-50, available at https://planning.lacity.org/eir/nops/HwdWilcox/initial_study.pdf
6400 Sunset (ENV-2016-3631-EIR)	6400 W. Sunset Boulevard, Los Angeles, California, 90028	Initial Study at p. B-39, available at https://planning.lacity.org/eir/nops/6400Sunset/initial_study.pdf
1360 N. Vine Street Project (ENV-2016-3778-EIR)	1360 N. Vine Street, Los Angeles, California, 90028-8140	Initial Study at p. B-50, available at https://planning.lacity.org/eir/nops/1360%20Vine%20Street/initial_study_checklist.pdf
5420 Sunset Project (ENV-2017-1084-EIR)	5420–5450 West Sunset Boulevard, 1418–1440 North Western Avenue, and 1441 North Serrano Avenue, Los Angeles, California, 90027	Initial Study at p. B-49 to B-50, available at https://planning.lacity.org/eir/nops/5420Sunset/5420%20Sunset%20Project%20Initial%20Study.pdf

Project Name	Project Address	Source
Sunset Gower Studios Enhancement Plan (ENV-2017-5091-EIR)	6010, 6050 and 6060 Sunset Boulevard, 1455 North Beachwood Drive, 1455 Gordon Street, and 1438 and 1440 North Gower Street, Los Angeles, CA 90028	Initial Study at p. B-47, available at https://planning.lacity.org/eir/nops/Sunset_Gower_Studios_EP/InitialStudy.pdf

Due to these omissions, the EIR understates the Project's cumulative, regional impacts to traffic and circulation impacts. Therefore, mitigation measures will likely need to be modified to account for higher levels of cumulative congestion in surrounding streets.

iii. Failure to Disclose, Analyze, and Mitigate Impacts of Ridesharing and Shared Mobility Services on Traffic and Circulation Impacts

The EIR fails to disclose, analyze, or mitigate the consequences of the proliferation of ridesharing and shared mobility services in Hollywood. In urban areas like Los Angeles, research have identified trends that show residents are using shared mobility services more frequently, and they are using buses and light-rail transit less frequently.²⁹ That means that there will likely be more cars, scooters, and bicycles on the road in the future. The EIR does not discuss this paradigm shift and relies heavily on the (unsubstantiated) assumption that the Project will successfully implement a Transportation Demand Management System that *reduces* the number of automobile trips to and from the Project.

The EIR also fails to disclose, analyze, or mitigate circulation impacts or traffic conflicts caused by queuing ridesharing services (and taxis) that pick up and drop off from residential, hotel, dining, and entertainment facilities at the Project site. In Hollywood, it is not uncommon for bars and nightclubs to see a steady stream of Ubers and Lyfts lining up on the street to pick up or drop off patrons.³⁰ The EIR does not disclose how this type of queuing would affect traffic patterns and circulation.

²⁹ Clewlow & Mishra, *Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States*, available at https://itspubs.ucdavis.edu/wp-content/themes/ucdavis/pubs/download_pdf.php?id=2752.

³⁰ Ryzik, How Uber is Changing Night Life in Los Angeles, available at <https://www.nytimes.com/2014/11/02/fashion/how-uber-is-changing-night-life-in-los-angeles.html>.

Moreover, the EIR fails to disclose, analyze, or mitigate potential traffic conflicts between automobiles and shared dockless bicycle or scooter services. The EIR also does not disclose, analyze, or mitigate conflicts that may occur between pedestrians and dockless scooters and bicycles on sidewalks and other ground-level public spaces. At the very least, this Project's mitigation plan should involve procedures for removing dockless devices that block public rights of way.

iv. Failure to Disclose, Analyze, and Mitigate Impacts of Eliminating Parking and Lanes of Traffic

The EIR treats SB 743 as a license to completely ignore impacts caused by eliminating on-street parking. Consequently, the EIR fails to disclose secondary circulation impacts caused by cars that queue while waiting to enter and exit parking garages, by drivers who circle the project site in the hopes that they find on-street parking, or by drivers who venture out into the surrounding neighborhood in the hopes that they can find on-street parking there. Furthermore, CEQA requires that "secondary parking impacts caused by ensuing traffic congestion ('air quality, noise, safety, or any other impact associated with transportation') must be addressed" in an appropriate CEQA document. (*Covina Residents for Responsible Development v. City of Covina* (2018) 21 Cal.App.5th 712, 728) The EIR's failure to disclose these types of secondary impacts from the loss of on-street parking is a serious error.

The lack of an adequate project description regarding the elimination of parking and streetscape enhancements also frustrate the ability of the public and decisionmakers to scrutinize the Project's adverse environmental effects. For example, the EIR does not say whether, during the operational phase of the Project, one lane of traffic or on street parking (or both) will be removed from McCadden Place, where sidewalks on both sides of the street will be widened from approximately five feet to 12 feet in width. Consequently, there is no way to reasonably or meaningfully evaluate how these Project elements will effect the environment.

v. Failure to Implement Appropriate or Sufficient Mitigation

Although the developer has stated that the Project would implement a Construction Management Plan, as identified in Project Design Feature TRA-PDF-1 on pages IV.L-82 through IV.L-84 in Section IV.L, Traffic, Access, and Parking, of the Draft EIR, to ensure adequate access and circulation in areas and streets immediately adjacent to the Project Site, there is no substantial evidence showing that such plan would effectively resolve actually address such concerns for the immediately adjacent areas and streets. City staff simply guesses that the Construction Management Plan will successfully mitigate impacts, but it has provided no substantial evidence to substantiate this claim.

Additionally, HMC informed the CPC that “the loss of access and parking would also make it near impossible for disabled patrons having safe proper ingress and egress from and to same during the proposed 5 to 7 years of construction.” Staff responded simply by saying that the Construction Management Plan will ensure that access is provided. But how will this be possible if the sidewalks along McCadden are closed and there is nowhere to safely offload passengers because the street is filled with construction vehicles? The EIR does not provide answers to these questions.

The mitigation plan should, at the very least eliminate use of N. McCadden Place for construction traffic as to substantially mitigate against noise, exhaust, and pollution adversely impacting effecting the outdoor dining and production facility with indoor and outdoor sound production and recording. City staff alleges that “noise and air quality effects from construction trucks would be limited,” but again, this is a guess that is not substantiated by any evidence. (See response 2-8.)

n. Failure to Disclose, Evaluate and Mitigate Impacts to Public Utilities

Shockingly, the EIR discloses that the Los Angeles Department of Water and Power can only guarantee sufficient water supplies up the year 2040. That means that if the Project is completed by 2024, residents will only be able to enjoy life in their homes for less than two decades before the taps may run dry. What will happen after 2040? The EIR does not say, and therefore is silent with respect to potential impacts that occur after the year 2040.

Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 441 is directly on point. There, the Court of Appeal held that an EIR was legally inadequate because the lead agency could not show, with certainty, that long-term water supplies would be available by the year 2030 to meet total demand. The court wrote:

“Without an explanation that shows at least an approximate long-term sufficiency in total supply, the public and decision makers could have no confidence that the identified sources were actually likely to fully serve this extraordinarily large development project. An EIR that neglects to explain the likely sources of water and analyze their impacts, but leaves long-term water supply considerations to later stages of the project, does not serve the purpose of sounding an ‘environmental ‘alarm bell’ ” (*Laurel Heights I, supra*, 47 Cal.3d at p. 392) before the project has taken on overwhelming ‘bureaucratic and financial momentum’ (*id.* at p. 395).”

(*Ibid.*) The Crossroads EIR suffers from this exact same flaw. By failing to disclose that long-term water supplies are available, it fails to assure the public that the Project is viable in the long term.

Furthermore, HMC has noted that there will extensive disruption of services at the Subject Properties and in the surrounding neighborhood. Such disruptions – especially to the impacted food establishments – are not addressed and no mitigation efforts are proposed, again, because

the developer misleadingly describes the disruptions as temporary without identifying how temporary or proposing any alternatives to offset the impact of losses of water, electricity, and gas service.

In this regard, the entire Bureau of Engineering conditions fail to provide proper mitigation for the drastic consequences for the loss of and disruption of services for water, electric, sewage, gas, and other utilities and services, as they affect surrounding businesses and residents. At the very least, the developer should be required to put into escrow mitigation funds to reimburse any business for the loss of revenue associated with these disruptions and related Project impacts. No effort has been made to assess the severity of service disruptions and their own direct and indirect impacts, including public health risks.

Finally, the failure to identify the 11 related projects listed above completely undermines the accuracy of the EIR's disclosures regarding cumulative demands for utilities, including water, electricity, sewage, and the need for new public infrastructure to supply these utilities.

o. Failure to Provide Feasible Mitigation Measures and Impermissible Deferral of Mitigation

Because it has significant impacts even after mitigation, disapproval of the Project is required unless there are no feasible mitigation measures or alternatives, *and* specific benefits outweigh the significant impact. (Pub. Resources Code, § 21081.) That is because CEQA requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects. (Pub. Resources Code, § 21002; *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41.) The Legislature has stated:

“The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. . . . The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.”

(Pub. Resources Code, § 21002.) CEQA mandates that:

“Pursuant to the policy stated in [Public Resources Code] Sections 21002 and 21002.1, no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the Project is approved or carried out unless both of the following occur:

“(a)... (3) Specific economic, legal, social, technological, or other considerations . . . make infeasible the mitigation measures or alternatives identified in the environmental impact report.”

(Pub. Resources Code § 21081.) The Guidelines that implement CEQA restate this requirement. (Guidelines, § 15091, subd. (a)(3).) Specifically, mitigation measures must be “required in, or incorporated into” the project. (Pub. Resources Code, § 21081, subd. (a)(1); *Federation of Hillside and Canyon Assoc. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261.) Deferral of the analysis of the feasibility and adoption of mitigation measures violates CEQA. (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306-308.)

In this case, many of the mitigation measures are no more than a vague promise to “comply with the law.” These measures do not meet CEQA’s mandate for effective, enforceable mitigation measures, and it is a prejudicial abuse of discretion for the City to rely on same in approving the subject Vesting Tentative Tract Map.

p. Failure to Assess a Reasonable Range of Alternatives

The EIR fails to assess a reasonable range of alternatives that reduce adverse impacts on sensitive receptors in the neighborhood, and it fails to assess alternatives that allow for the Project to be built incrementally, over a period several decades, while waiting for the City to improve the infrastructure and services needed to support such a large project.

q. Failure to Provide Adequate Overriding Considerations

The Project’s statement of overriding considerations is legally inadequate. It contrives justifications for the Project’s existence, despite a large public outcry that has advised the City a project of this magnitude is inappropriate for the community.

The statement of overriding considerations says that the project will help satisfy the market demand for housing in the region. But the project doesn’t provide the type of housing that the market is looking for (affordable housing) – it primarily provides high-end residential housing that is unaffordable to those who need housing the most, or those who are priced out of the local market.

IV. The City Planning Commission’s Decision to Sustain the Advisory Agency’s Approval of Vesting Tentative Tract Map No. 73568 Violates the Subdivision Map Act and the Los Angeles Municipal Code

The approval of Vesting Tentative Tract Map No. 73568 is severely flawed in several respects, including it being based on a legally inadequate EIR, and its failure to comply with Government

Code § 66474. As such, the Advisory Agency prejudicially abused its discretion in approving Vesting Tentative Tract Map No.73568.

The Project site is not suitable for the proposed changes to the area and increased density of the Project. The EIR does not show otherwise. There is no substantial evidence establishing that the proposed density of the development can be supported by the public infrastructure and public services, including mass transit, traffic conditions even now, schools, and level of emergency services and policing required to accommodate the Project.

By way of example, the proposed floor area ratio for portions of the Project far exceed what is allowable under the Municipal Code. They even exceed what was granted to the Millennium. What is more, because allowable floor area ratios would be far exceeded, the City would be required to proceed under the variance procedures of Municipal Code section 12.27. However, no variance could be properly granted because there is no hardship other than one that is self-imposed by the applicant's massive Project design, and the grant of a variance would impermissibly give the applicant special privileges not enjoyed by other property owners in the same zone. Los Angeles City Charter section 562 and Municipal Code section 12.27 prohibit the grant of a special privilege to a property owner.

The City's findings also violate Government Code sections 66473.5 and 66474, subsections (c), (d), (f) and (g) in that the Project is inconsistent with the City's general plan and long-term planning goals.

Finally, pursuant to LAMC section 17.06, the City should deny approval of the VTTM because the City has failed to substantiate that there will be "adequate water supply" past the year 2040, and given the unmitigable traffic congestion in the neighborhood, the City has not substantiated that there will be "adequate access" to the Project site. Nor has the City substantiated that the Project will be served by adequate fire protection, or that fire services won't be blocked from the Project site by traffic congestion in the neighborhood.

V. The City Planning Commission Erred in Approving the Project's Density Bonus Compliance Review

The Project's Density Bonus Compliance Review is legally deficient. The City's findings fail to recognize that the Project's unmitigable adverse environmental impacts are "adverse impact[s] upon public health and safety" that preclude a finding that the bonus is appropriate under the second criterion for granting the bonus. Additionally, approval of the bonus is legally deficient because it relies on an EIR that is legally inadequate under CEQA and

VI. The City Planning Commission Erred in Approving Master Conditional Use Permits for the On-site and Off-site Sale, Dispensing, and Consumption of Alcohol and Uses with Public Dancing and Live Entertainment.

First of all, the LAMC does not provide a procedure for granting a so-called "master conditional use permit." The City's decision in the present case to combine 22 separate permits into a single CUP is legally improper, and it frustrates the basic purpose of individually examining whether each permit, on its own, satisfies the required findings under LAMC 12.24(E). The City's failure to describe the location and proposed uses also makes it impossible to determine whether granting the permit was proper. In any event, the so-called "master CUP" cannot meet the required findings.

For the first finding, there is no substantial evidence in the record that all 22 licenses will allow the project to provide a service that is "essential." On the contrary, there are hundreds of establishments in the neighborhood that already provide the same services.

For the second finding, the absence of any information about where the locations at which the licenses will be used precludes a finding that "the project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety."

For the third finding, as discussed above, the Project does not conform to General Plan policies.

VII. The City Planning Commission Erred in Approving a Major Development Project Conditional Use Permit

Again, the City cannot make the required findings for this Conditional use permit. There is no substantial evidence in the record showing that 250 hotel rooms will provide an essential service, and the Project does not conform to General plan policies.

VIII. The City Planning Commission Erred in Approving the Project's Site Plan Review

The findings for the site plan review are legally deficient, and they rely upon a legally deficient EIR and VTTM.

IX. The Record Does Not Contain Substantial Evidence Showing that the Project Complies with the Public Trust Doctrine

As noted above in our discussion of the EIR's information disclosure inadequacies, the groundwater basin underlying the Project site is subject to the Public Trust doctrine because it is hydrologically connected to Public Trust surface waters. Substantive Public Trust violations will occur if Project activities adversely affect Public Trust Surface Waters. The City has provided no

substantial evidence to show that it will comply with its Public Trust obligations to groundwater and surface water.

The Public Trust Doctrine also encompasses a duty to protect wildlife. (*Environmental Protection Information Center v. California Department of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 515 [“There is doubtless an overlap between the two public trust doctrines – the protection of water resources is intertwined with the protection of wildlife.”].) Therefore, the City will also violate its Public Trust obligations if Project activities harm wildlife (e.g. by causing deaths of migratory birds that collide with tall buildings). The City has provided no substantial evidence to show that it will comply with its Public Trust obligations to wildlife.

The City also has an obligation to provide written findings that Project activities will not adversely affect Public Trust resources. Administrative agencies that issue quasi-judicial decisions must “set forth findings to bridge the analytic gap between the raw evidence and ultimate decision or order.” (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515.) In these findings, agencies must demonstrate “the analytic route the administrative agency traveled from evidence to action.” (*Ibid.*) Appellate bodies may not presume “that an agency’s rulings rest upon the necessary findings” when such agencies “*must expressly state their findings and must set forth the relevant supportive facts.*” (*Broadway, Laguna, Vallejo Assn. v. Board of Permit Appeals* (1967) 66 Cal.2d 767, 773; accord, *Walnut Acres Neighborhood Assn. v. City of Los Angeles* (2015) 235 Cal.App.4th 1303, 1312-1313.) The CPC’s failure to make these required findings was prejudicial error. More importantly, given that the City has provided no substantial evidence to show that it will comply with its Public Trust obligations, the City will not be able to make legally adequate findings in the absence of such evidence.

X. SB 743 Is Facially Unlawful

The Crossroads Project EIR relies heavily on SB 743 as an excuse to avoid its duty to disclose, evaluate, and mitigate the project’s direct, indirect, and cumulative impacts on the environment. We object to SB 743 as being facially invalid; it is inherently inconstant with CEQA’s fundamentally purposes, goals, and requirements. Likewise, it conflicts with due process protections enshrined in the California and Federal constitutions. It permits public agencies and project proponents to avoid public disclosure of adverse effects on humans and the environment, as well as requirements to implement mitigations that would prevent harm to human health and wellbeing. It also conflicts with CEQA requirements to not approve projects when there are feasible alternatives available that would substantially lessen a project’s adverse environmental effects. (See § 21002.)

The legislature cannot pick and choose what is considered part of the physical environment. It cannot limit CEQA by ordaining that a specific species or a specific location is less deserving of environmental protection. All aspects of the physical environment are interconnected; if the law ignores project effects on one aspect of the environment, lead agencies will invariably use it as an

Honorable President Herb Wesson and
Members of the Los Angeles City Council
November 13, 2018
Page 40

opportunity to duck their obligations to disclose, evaluate, and mitigate secondary and indirect impacts on other aspects of the environment.

XI. Conclusion

For the reasons shown above, we respectfully request that this honorable council grant HMC's appeal, deny certification of the Crossroad Project EIR, deny approval of VTTM No. 73568, and deny approval of all project entitlements.

This Project is simply too big, and the City doesn't have infrastructure to support it. We should not rush it through the approval process. It is simply too consequential, and we cannot afford errors in its environmental review.

Sincerely,

ANGEL LAW

A handwritten signature in cursive script that reads "Ellis Raskin".

Ellis Raskin

**EXHIBIT 2: CITY PLANNING COMMISSION
LETTER OF DETERMINATION**



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300

www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: **OCT 31 2018**

Case No. VTT-73568-1A

Council District: 13 – O'Farrell

CEQA: ENV-2015-2026-EIR; SCH No. 2015101073

Plan Area: Hollywood

Related Case: CPC-2015-2025-DB-MCUP-CU-SPR

Project Site: 1540–1552 Highland Avenue
6663–6675 Selma Avenue,
1543–1553 McCadden Place,
1501–1573 Las Palmas Avenue,
1600–1608 Las Palmas Avenue,
6700–6760 Selma Avenue,
6660 Selma Avenue,
1542–1546 McCadden Place,
1500–1570 Las Palmas Avenue,
6665–6713½ Sunset Boulevard

Applicant: Bill Myers, CRE-HAR Crossroads SPV, LLC
Representative: Kyndra J. Casper, DLA Piper, LLP

Appellants: Livable LA
Representative: Douglas P. Carstens, Chatten-Brown & Carstens LLP

Hollywood Media Center, LLC
Representative: Michael J. Saltz, Jacobson, Russell, Saltz, Nassim &
De La Torre LLP

At its meeting of **September 13, 2018**, the Los Angeles City Planning Commission took the actions below in conjunction with the approval of the following project:

A Vesting Tentative Tract for the merger and resubdivision of a 6.86 net acre site into five ground lots and 30 airspace lots, for the development of 950 residential apartments, 308 key hotel and 190,000 square feet of commercial use (68,000 square feet of commercial is existing).

1. **Found**, pursuant to Sections 21082.1(c) and 21081.6 of the Public Resources Code, the City Planning Commission has reviewed and considered the information contained in the Environmental Impact Report prepared for this project, which includes the Draft EIR, No. ENV-2015-2026-EIR (SCH No. 2015101073), dated May 11, 2017, the Final EIR, dated May 4, 2018, and the Errata, dated August 2018 (Crossroads Hollywood Project EIR), as well as the whole of the administrative record;

Certified the following:

- a. The Crossroads Hollywood Project EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
- b. The Crossroads Hollywood Project EIR was presented to the City Planning Commission as a decision-making body of the lead agency; and
- c. The Crossroads Hollywood Project EIR reflects the independent judgment and analysis of the lead agency;

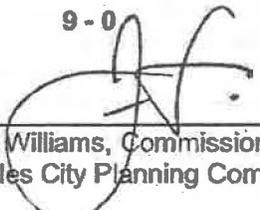
Adopted the following:

- a. The related and prepared Crossroads Hollywood Project Environmental Findings;
 - b. The Statement of Overriding Considerations;
 - c. The Mitigation Monitoring Program prepared for the Crossroads Hollywood Project EIR;
2. **Denied** the appeal, and **sustained** the decision of the Deputy Advisory Agency in approving Vesting Tentative Tract Map No. 73568 for the merger and resubdivision of a 6.86 net acre site into 5 ground lots and 30 airspace lots;
 3. **Adopted** the Conditions of Approval; and
 4. **Adopted** the Findings.

The vote proceeded as follows:

Moved: Khorsand
 Second: Perlman
 Ayes: Ambroz, Choe, Mack, Mitchell, Padilla Campos, Millman, Dake Wilson

Vote: 9 - 0



 James K. Williams, Commission Executive Assistant II
 Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is appealable to the Los Angeles City Council within 10 days after the mailing date of this determination letter. Any appeal not filed within the 10-day period shall not be considered by the Council. All appeals shall be filed on forms provided at the Planning Department's Development Service Centers located at: 201 North Figueroa Street, Fourth Floor, Los Angeles; 6262 Van Nuys Boulevard, Suite 251, Van Nuys; or 1828 Sawtelle Boulevard, West Los Angeles.

FINAL APPEAL DATE:

NOV 13 2018

Notice: An appeal of the CEQA clearance for the Project pursuant to Public Resources Code Section 21151(c) is only available if the Determination of the non-elected decision-making body (e.g., ZA, AA, APC, CPC) is not further appealable and the decision is final.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Conditions of Approval and Findings

c: Charles Rausch Jr., Principal City Planner
 Heather Bleemers, Senior City Planner

CONDITIONS OF APPROVAL

BUREAU OF ENGINEERING - SPECIFIC CONDITIONS

1. That any fee deficit under Work Order No. E1908005 be paid.
2. That five-foot wide strips of land be dedicated along Las Palmas Avenue adjoining the tract adjoining Ground Lots No. 1, 2 and 4 to complete 30-foot wide half public rights-of-ways including 15-foot radius property line returns at the intersections with Selma Avenue and a 20-foot radius property line return at the intersection with Sunset Boulevard. Above dedications shall be limited to depth of 10-foot below finished sidewalk surfaces and limited to 14-foot above finished sidewalk surfaces and all widths shall be limited to 4-foot measured from the new property lines.
3. That seven-foot wide strips of land be dedicated along McCadden Place adjoining the tract to complete a 60-foot wide public right-of-way including 15-foot radius property line returns at the intersection with Selma Avenue. Above dedications shall be limited to depth of 10-foot below finished sidewalk surfaces and limited to 14-foot above finished sidewalk surfaces and all widths shall be limited to 4-foot measured from the new property lines.
4. That a 20-foot radius property line return be dedicated at the intersection of Highland Avenue and Selma Avenue adjoining the tract.
5. That a revised Tentative Tract map shall be submitted showing the above limited dedications for review and approval only. No revised map fee or public hearing is necessary.
6. That the subdivider make a request to the Central District Office of the Bureau of Engineering to determine the capacity of existing sewers in this area.
7. That a set of drawings for airspace lots be submitted to the City Engineer showing the followings:
 - a. Plan view at different elevations.
 - b. Isometric views.
 - c. Elevation views.
 - d. Section cuts at all locations where air space lot boundaries change.
8. That the owners of the property record an agreement satisfactory to the City Engineer stating that they will grant the necessary private easements for ingress and egress purposes to serve proposed airspace lots to use upon the sale of the respective lots and they will maintain the private easements free and clear of obstructions and in safe conditions for use at all times.

Note: Additional public street dedication may be required by LADOT.

DEPARTMENT OF BUILDING AND SAFETY, GRADING DIVISION

9. Prior to issuance of a grading or building permit, or prior to recordation of the final map, the subdivider shall make suitable arrangements to assure compliance, satisfactory to the Department of Building and Safety, Grading Division, with all the

requirements and conditions contained in the email dated April 23, 2018 attached to the case file for Tract No. VTT-73568.

DEPARTMENT OF BUILDING AND SAFETY, ZONING DIVISION

10. Prior to recordation of the final map, the Department of Building and Safety, Zoning Division shall certify that no Building or Zoning Code violations exist on the subject site. In addition, the following items shall be satisfied:
- a. Provide copy of building records, plot plan, and certificate of occupancy of all existing structures to remain (Ground Lot 1) to verify the last legal use and the number of parking spaces required and provided on each site.
 - b. Obtain permits for the demolition or removal of all existing structures on the site. Accessory structures and uses are not permitted to remain on lots without a main structure or use. Provide copies of the demolition permits and signed inspection cards to show completion of the demolition work.
 - c. A portion of the existing boundary of Ground Lot 1 was cut after 7/29/1962. Any lot cut done after 7/29/1962 requires a Certificate of Compliance in order to be considered a legal lot cut. Provide a copy of the Certificate of Compliance for the lot cut prior to obtaining the Zoning clearance.
 - d. Provide a copy of the Zone Change ordinance to remove the D condition prior to obtaining Zoning clearance.
 - e. Provide a copy of affidavit AFF-6664 (for Ground Lot 1), AF-93-1832045-MB and AF-93-1832044-LT (for Ground Lot 3), and AFF-10120 (for Ground Lot 5). Show compliance with all the conditions/requirements of the above affidavit(s) as applicable. Termination of above affidavit(s) may be required after the Map has been recorded. Obtain approval from the Department, on the termination form, prior to recording.
 - f. Provide a copy of CPC cases CPC cases CPC-2016-4927-DA, CPC-2016-1450-CPU, CPC-2015-2025-ZC-HD-MCUP-CU-ZV-SPR, and CPC-2014-669-CPU. Show compliance with all the conditions/requirements of the CPC cases as applicable.
 - g. Show all street dedication as required by Bureau of Engineering and provide net lot area after all dedication. "Area" requirements shall be re-checked as per net lot area after street dedication. Front and side yard requirements shall be required to comply with current code as measured from new property lines after dedications.
 - h. The submitted Map does not comply with the maximum density (200 s.f. of lot area/dwelling unit) requirement of the R5 Zone as allowed for the C Zone within the Regional Center Commercial Area. Revise the Map to show compliance with the above requirement for each Ground Lot or obtain approval from the Department of City Planning.

- i. Record a Covenant and Agreement for each ground lot with air space lots (Lots 1, 2, 3, and 4) to treat the buildings and structures located in an Air Space Subdivision as if they were within a single lot.

Notes: Each Air Space lot shall have access to a street by one or more easements or other entitlements to use in a form satisfactory to the Advisory Agency and the City Engineer.

The submitted Map may not comply with the number of parking spaces required by Section 12.21 A 4 (a) based on number of habitable rooms in each unit. If there are insufficient numbers of parking spaces, obtain approval from the Department of City Planning.

The submitted Map may not comply with the number of guest parking spaces required by the Advisory Agency.

The proposed building plans have not been checked for and shall comply with Building and Zoning Code requirements. With the exception of revised health or safety standards, the subdivider shall have a vested right to proceed with the proposed development in substantial compliance with the ordinances, policies, and standards in effect at the time the subdivision application was deemed complete. Plan check will be required before any construction, occupancy or change of use.

If the proposed development does not comply with the current Zoning Code, all zoning violations shall be indicated on the Map.

An appointment is required for the issuance of a clearance letter from the Department of Building and Safety. The applicant is asked to contact Laura Duong at (213) 482-0434 to schedule an appointment.

DEPARTMENT OF TRANSPORTATION

11. Prior to recordation of the final map, satisfactory arrangements shall be made with the Department of Transportation to assure:
 - a. A minimum of 20-foot reservoir space be provided between any security gate(s) and the property line when driveway is serving less than 100 parking spaces. Reservoir space will increase to 40-feet and 60-feet when driveway is serving more than 100 and 300 parking spaces respectively.
 - b. Parking stalls shall be designed so that a vehicle is not required to back into or out of any public street or sidewalk.
 - c. A parking area and driveway plan be submitted to the Citywide Planning Coordination Section of the Department of Transportation for approval prior to submittal of building permit plans for plan check by the Department of Building and Safety. Transportation approvals are conducted at 201 N. Figueroa Street, Room 550. For an appointment, call (213) 482-7024.

- d. That a fee in the amount of \$205 be paid for the Department of Transportation as required per Ordinance No. 180542 and LAMC Section 19.15 prior to recordation of the final map. Note: the applicant may be required to comply with any other applicable fees per this new ordinance.

FIRE DEPARTMENT

12. Prior to the recordation of the final map, a suitable arrangement shall be made satisfactory to the Fire Department, binding the subdivider and all successors to the following:
 - a. Access for Fire Department apparatus and personnel to and into all structures shall be required.
 - b. The entrance to a Residence lobby must be within 50 feet of the desired street address curb face.
 - c. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance of individual units.
 - d. The entrance or exit of all ground dwelling units shall not be more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
 - e. No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
 - f. The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.
 - g. 2014 CITY OF LOS ANGELES FIRE CODE, SECTION 503.1.4 (EXCEPTION)
 - i. When this exception is applied to a fully fire sprinklered residential building equipped with a wet standpipe outlet inside an exit stairway with at least a 2 hour rating the distance from the wet standpipe outlet in the stairway to the entry door of any dwelling unit or guest room shall not exceed 150 feet of horizontal travel AND the distance from the edge of the roadway of an improved street or approved fire lane to the door into the same exit stairway directly from outside the building shall not exceed 150 feet of horizontal travel.
 - ii. It is the intent of this policy that in no case will the maximum travel distance exceed 150 feet inside the structure and 150 feet outside the structure. The term "horizontal travel" refers to the actual path

of travel to be taken by a person responding to an emergency in the building.

- iii. This policy does not apply to single-family dwellings or to non-residential buildings.
- h. Entrance to the main lobby shall be located off the address side of the building.
- i. Any required Fire Annunciator panel or Fire Control Room shall be located within 50ft visual line of site of the main entrance stairwell or to the satisfaction of the Fire Department.
- j. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
- k. The width of private roadways for general access use and fire lanes shall not be less than 20 feet, and the fire lane must be clear to the sky.
- l. Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.
- m. Submit plot plans indicating access road and turning area for Fire Department approval.
- n. During demolition, the Fire Department access will remain clear and unobstructed.
- o. Adequate public and private fire hydrants shall be required.
- p. That in order to provide assurance that the proposed common fire lane and fire protection facilities, for the project, not maintained by the City, are properly and adequately maintained, the sub-divider shall record with the County Recorder, prior to the recordation of the final map, a covenant and agreement (Planning Department General Form CP-6770) to assure the following:
 - i. The establishment of a property owners association, which shall cause a yearly inspection to be, made by a registered civil engineer of all common fire lanes and fire protection facilities. The association will undertake any necessary maintenance and corrective measures. Each future property owner shall automatically become a member of the association or organization required above and is automatically subject to a proportionate share of the cost.
 - ii. The future owners of affected lots with common fire lanes and fire protection facilities shall be informed of their responsibility for the maintenance of the devices on their lots. The future owner and all successors will be presented

with a copy of the maintenance program for their lot. Any amendment or modification that would defeat the obligation of said association as the Advisory Agency must approve required hereinabove in writing after consultation with the Fire Department.

- iii. In the event that the property owners association fails to maintain the common property and easements as required by the CC and R's, the individual property owners shall be responsible for their proportional share of the maintenance.
- iv. Prior to any building permits being issued, the applicant shall improve, to the satisfaction of the Fire Department, all common fire lanes and install all private fire hydrants to be required.
- v. That the Common Fire Lanes and Fire Protection facilities be shown on the Final Map.
- q. Those plot plans be approved by the Fire Department showing fire hydrants and access for each phase of the project prior to the recording of the final map for that phase. Each phase shall comply independently with code requirements.
- r. Standard cut-corners will be used on all turns.
- s. The Fire Department may require additional roof access via parapet access roof ladders where buildings exceed 28 feet in height, and when overhead wires or other obstructions block aerial ladder access.
- t. Site plans shall include all overhead utility lines adjacent to the site.
- u. Any roof elevation changes in excess of 3 feet may require the installation of ships ladders.
- v. All parking restrictions for fire lanes shall be posted and/or painted prior to any Temporary Certificate of Occupancy being issued.
- w. Plans showing areas to be posted and/or painted, "FIRE LANE NO PARKING" shall be submitted and approved by the Fire Department prior to building permit application sign-off.
- x. Electric Gates approved by the Fire Department shall be tested by the Fire Department prior to Building and Safety granting a Certificate of Occupancy.
- y. 5101.1 Emergency responder radio coverage in new buildings. All new buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication systems of the jurisdiction at the exterior of the building. This section shall not require improvement of the existing public safety communication systems.

- z. City of Los Angeles Fire Department Hydrants and Access design requirements for the outdoor and indoor use of dependent access (attended parking) Mechanical Car Stackers – 2, 3, & 4 by levels high. The provisions of this document shall regulate the use of Mechanical Car Stackers by addressing the arrangement, location and size of areas, height, separations, housekeeping, and fire protection.
- aa. Recently, the Los Angeles Fire Department (LAFD) modified Fire Prevention Bureau (FPB) Requirement 10. Helicopter landing facilities are still required on all High-Rise buildings in the City. However, FPB's Requirement 10 has been revised to provide two new alternatives to a full FAA-approved helicopter landing facilities. Each standpipe in a new high-rise building shall be provided with two remotely located FDC's for each zone in compliance with NFPA 14-2013, Section 7.12.2.
- bb. The applicant is further advised that all subsequent contact regarding these conditions must be with the Hydrant and Access Unit. This would include clarification, verification of condition compliance and plans or building permit applications, etc., and shall be accomplished BY APPOINTMENT ONLY, in order to assure that you receive service with a minimum amount of waiting please call (213) 482-6509. You should advise any consultant representing you of this requirement as well.

BUREAU OF STREET LIGHTING

- 13. Prior to the recordation of the final map or issuance of the Certificate of Occupancy (C of O), street lighting improvement plans shall be submitted for review and the owner shall provide a good faith effort via a ballot process for the formation or annexation of the property within the boundary of the development into a Street Lighting Maintenance Assessment District.

DEPARTMENT OF WATER AND POWER

- 14. Arrangements shall be made for compliance with the Los Angeles Department of Water and Power (LADWP) Water System Rules and requirements, satisfactory to the LADWP memo dated June 4, 2018. Upon compliance with these conditions and requirements, LADWP's Water Services Organization will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1.(c).)

BUREAU OF SANITATION

- 15. Satisfactory arrangements shall be made with the Bureau of Sanitation, Wastewater Collection Systems Division for compliance with its sewer system review and requirements. Upon compliance with its conditions and requirements, the Bureau of Sanitation, Wastewater Collection Systems Division will forward the necessary clearances to the Bureau of Engineering. (This condition shall be deemed cleared at the time the City Engineer clears Condition No. S-1. (d).)

INFORMATION TECHNOLOGY AGENCY

16. That satisfactory arrangements be made in accordance with the requirements of the Information Technology Agency to assure that cable television facilities will be installed in the same manner as other required improvements. Refer to the LAMC Section 17.05-N. Written evidence of such arrangements must be submitted to the Information Technology Agency, 200 North Main Street, 12th Floor, Los Angeles, CA 90012, (213) 922-8363.

DEPARTMENT OF RECREATION AND PARKS

17. That the Quimby fee be based on the C4-2D-SN AND C4-2D Zone. Note: since this tract case is vested, the project is not subject to the update in RAP fees per Ordinance No. 184,505.

URBAN FORESTRY DIVISION AND THE DEPARTMENT OF CITY PLANNING

18. Prior to the issuance of a grading permit, a plot plan prepared by a reputable tree expert, indicating the location, size, type, and condition of all existing trees on the site shall be submitted for approval by the Department of City Planning. All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

Replacement by a minimum of 24-inch box trees in the parkway and on the site of the 15 non-protected trees to be removed, and by a minimum of 48-inch box trees for the four protected trees to be removed, shall be required for the unavoidable loss of desirable trees on the site, and to the satisfaction of the Advisory Agency.

Note: Contact: Urban Forestry Division at: (213) 485-5675. Failure to comply with this condition as written shall require the filing of a modification to this tract map in order to clear the condition.

DEPARTMENT OF CITY PLANNING-SITE SPECIFIC CONDITIONS

19. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:
 - a. Limit the proposed development to 950 residential units, 308 hotel rooms, and approximately 190,000 square feet of commercial/retail space, for a total of approximately 1,381,000 square feet (including Crossroads of the World and the former Hollywood Reporter Building), consistent with the C4-2D-SN and C4-2D Zones.
 - b. Off-street parking for residential and commercial uses shall comply with the requirements of Case No. CPC-2015-2025-DB-MCUP-CU-SPR. In the event that Case No. CPC-2015-2025-DB-MCUP-CU-SPR is not approved, the project shall comply with the following requirements:

Provide a minimum of 2 covered off-street parking spaces per dwelling unit,

plus ¼ guest parking spaces per dwelling unit. All guest spaces shall be readily accessible, conveniently located, specifically reserved for guest parking, posted and maintained satisfactory to the Department of Building and Safety.

Commercial parking shall comply with LAMC Section 12.21-A,4.

Directions to guest parking spaces shall be clearly posted. Tandem parking spaces shall not be used for guest parking.

In addition, prior to issuance of a building permit, a parking plan showing off-street parking spaces, as required by the Advisory Agency; be submitted for review and approval by the Department of City Planning (200 North Spring Street, Room 750).

- c. The applicant shall install an air filters capable of achieving a Minimum Efficiency Rating Value (MERV) of at least 11 or better in order to reduce the effects of diminished air quality on the occupants of the project.
 - a. That a solar access report shall be submitted to the satisfaction of the Advisory Agency prior to obtaining a grading permit.
 - b. That the subdivider considers the use of natural gas and/or solar energy and consults with the Department of Water and Power and Southern California Gas Company regarding feasible energy conservation measures.
 - c. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.
 - d. The applicant shall install shielded lighting to reduce any potential illumination affecting adjacent properties.
20. Prior to the issuance of the building permit or the recordation of the final map, a copy of CPC-2015-2025-DB-MCUP-CU-SPR shall be submitted to the satisfaction of the Advisory Agency. In the event that CPC-2015-2025-DB-MCUP-CU-SPR is not approved, the subdivider shall submit a tract modification.
21. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

(i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

(ii) Reimburse the City for any and all costs incurred in defense of an action related

to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$50,000. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the applicant otherwise created by this condition.

DEPARTMENT OF CITY PLANNING-ENVIRONMENTAL MITIGATION MEASURES

22. Prior to recordation of the final map the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department requiring the subdivider to identify mitigation monitors who shall provide periodic status reports on the implementation of mitigation items required by Mitigation Condition Nos. 22, 23, 24 and 25 of the Tract's approval satisfactory to the Advisory Agency. The mitigation monitors shall be identified as to their areas of responsibility, and phase of intervention (pre-construction, construction, post-construction/maintenance) to ensure continued implementation of the above mentioned mitigation items.
23. Prior to the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

This Mitigation Monitoring Program ("MMP") has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that:

In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

The City of Los Angeles is the Lead Agency for the project and therefore is responsible for administering and implementing the MMP. Where appropriate, the project's Draft and Final EIRs identified mitigation measures and project design features to avoid or to mitigate potential impacts identified to a level where no significant impact on the environment would occur, or impacts would be reduced to the extent feasible. This MMP is designed to monitor implementation of the project's mitigation measures as well as its project design features.

As shown on the following pages, each required mitigation measure and proposed project design feature for the project is listed and categorized by impact area, with an accompanying identification of the following:

Enforcement Agency: The agency with the power to enforce the Mitigation Measure/Project Design Feature.

Monitoring Agency: The agency to which reports involving feasibility, compliance, implementation and development are made.

Monitoring Phase: The phase of the project during which the Mitigation Measure/Project Design Feature shall be monitored.

Monitoring Frequency: The frequency at which the Mitigation Measure/Project Design Feature shall be monitored.

Action Indicating Compliance: The action of which the Enforcement or Monitoring Agency indicates that compliance with the required Mitigation Measure/Project Design Feature has been implemented.

The project's MMP will be in place throughout all phases of the project. The project applicant will be responsible for implementing all mitigation measures and project design features unless otherwise noted. The applicant shall also be obligated to provide a certification report to the appropriate monitoring agency and the appropriate enforcement agency that compliance with the required mitigation measure or project design feature has been implemented. The City's existing planning, engineering, review, and inspection processes will be used as the basic foundation for the MMP procedures and will also serve to provide the documentation for the reporting program.

The certification report shall be submitted to the Major Project's Section at the Los Angeles Department of City Planning. Each report will be submitted to the Major Project's Section annually following completion/implementation of the applicable mitigation measures and project design features and shall include sufficient information and documentation (such as building or demolition permits) to reasonably determine whether the intent of the measure has been satisfied. The City, in conjunction with the applicant, shall assure that project construction and operation occurs in accordance with the MMP.

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 subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency.

The project shall be in substantial conformance with the project design features and mitigation measures contained in this Mitigation Monitoring Program. The enforcing departments or agencies may determine substantial conformance with project design features and mitigation measures in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a project design feature or mitigation measure may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project related approval, complies with CEQA Guidelines, Sections 15162 and 15164, including by preparing an addendum or subsequent environmental clearance to analyze the impacts from the modifications to or deletion of the project design features or mitigation measures. Any addendum or subsequent CEQA clearance shall explain why the project design feature or

mitigation measure is no longer needed, not feasible, or the other basis for modifying or deleting the project design feature or mitigation measure. Under this process, the modification or deletion of a project design feature or mitigation measure shall not require a modification to any project discretionary approval unless the Director of Planning also finds that the change to the project design features or mitigation measures results in a substantial change to the project or the non-environmental conditions of approval.

24. **Mitigation Monitor (Construction).** During the construction phase and prior to the issuance of building permits, the applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of project design features and mitigation measures during construction activities consistent with the monitoring phase and frequency set forth in this MMP

The Construction Monitor shall also prepare documentation of the applicant's compliance with the project design features and mitigation measures during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the applicant and Construction Monitor and be included as part of the applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the mitigation measures and project design features within two business days if the applicant does not correct the non-compliance within a reasonable time of notification to the applicant by the monitoring or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

25. **Mitigation Measures and Project Design Features.** The development of the project site is hereby bound to the following Mitigation Measures and Project Design Features, which are conditions of approval for the project.

Aesthetics, Views, Light/Glare, and Shading

AES-PDF-1: Temporary construction fencing will be placed along the periphery of the Project Site to screen construction activity from view at the street level.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

AES-PDF-2: The Project Applicant will ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such

temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: During field inspection(s)

Action Indicating Compliance: Field inspection sign-offs

AES-PDF-3: Outdoor lighting will be shielded such that the light source cannot be seen from adjacent residential properties, the public right-of-way, or from the above. However, construction lighting shall not be so limited as to compromise the safety of construction workers.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

AES-PDF-4: New on-site utilities that may be required to serve the Project will be installed underground.

Enforcement Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of Water and Power

Monitoring Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of Water and Power

Monitoring Phase: Pre-construction; Construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

AES-PDF-5: Mechanical, electrical, and roof top equipment (including Heating, Ventilation, and Air Conditioning [HVAC] systems), as well as building appurtenances, will be integrated into the Project's architectural design (e.g., placed behind parapet walls) and be screened from view from public rights-of-way.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy.

AES-PDF-6: Trash areas associated with the proposed buildings will be enclosed or otherwise screened from view from public rights-of-way during Project operation.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy.

AES-PDF-7: Design elements will be incorporated to limit the direct view of the light source surface for all exterior light fixtures and to ensure that the light source cannot be seen from adjacent residential properties, the public right-of-way, or from above. Such design elements will include one or more of the following: use of light fixtures that comply with the ratings specified in CALGreen Table 5.106B; use of light fixtures with a focused output where the output angles greater than 20 degrees from beam centerline do not exceed 500 candelas; glare shields and louvers attached to the front face of the light fixture; and/or architectural screens to conceal the direct view of the LED light fixtures the center of adjacent streets at the Project Site boundary to the north, south, east, and west.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

AES-PDF-8: Glass used in building façades will be anti-reflective or treated with an anti-reflective coating in order to minimize glare (e.g., minimize the use of glass with mirror coatings). Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

AES-PDF-9: All Project illuminated signs will not exceed 600 candelas per square meter from one hour before sunset to one hour after sunrise, with the exception of Project illuminated signs adjacent to and facing Selma Avenue, which will not exceed 150 candelas per square meter from one hour before sunset to one hour after sunrise. At Plan check, building plans will include documentation prepared by a lighting consultant verifying compliance with this measure.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

Air Quality

AIR-MM-1: All construction equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

AIR-MM-2: Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall have their engines turned off after 5 minutes when not in use, to reduce vehicle emissions.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodically during construction

Action(s) Indicating Compliance: Field inspection sign-off

AIR-MM-3: Construction activities shall be discontinued during second-stage smog alerts. A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site.

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during every second-stage smog alert

Action Indicating Compliance: Field inspection sign-off

AIR-MM-4: Construction activity shall utilize electricity from power poles or solar power, rather than diesel power generators and/or gasoline power generators. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment shall be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodically during construction

Action Indicating Compliance: Field inspection sign-off

AIR-MM-5: During plan check, the Project representative shall make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the grading/excavation/export phase. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided on-site at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit.

Off-road diesel-powered equipment that will be used an aggregate of 40 or more hours during any portion of the construction activities associated with grading/excavation/export phase shall meet Tier 4 standards to the extent such equipment is commercially available, but if such equipment meeting Tier 4 standards is not commercially available, then such equipment shall meet Tier 3 standards. Furthermore, where equipment meeting Tier 4 standards is not commercially available, substantial evidence of that fact shall be provided to the City. Construction contractors supplying heavy duty diesel equipment greater than 50 horsepower shall be encouraged to apply for AQMD SOON funds. Information including the AQMD website shall be provided to each contractor which uses heavy duty diesel for on-site construction activities.

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Field inspection sign-off

AIR-MM-6: During construction, the Project shall give preference to contractors for soil import/export that have haul trucks meeting EPA Model Year 2007/2010 NO_x emissions levels when such trucks are reasonably available.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodically during construction

Action Indicating Compliance: Field inspection sign-off

Greenhouse Gas Emissions

GHG-PDF-1: The design of the new buildings will incorporate features to be capable of achieving at least Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)-CS® or LEED-NC® Rating System as of January 1, 2011. Specific sustainability features that are integrated into the Project design to enable the Project to achieve LEED® Silver certification will include the following:

- Exceeding Title 24, Part 6, California Energy Code baseline standard requirements by 15 percent for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirements.
- Use of Energy Star-labeled products and appliances.
- Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.
- Reduce indoor water use by a minimum of 35 percent from the calculated baseline, as required for LEED® Silver certification, by installing water fixtures that exceed applicable standards.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

GHG-PDF-2: The residential units within the Project will not include the use of fireplaces.

Enforcement Agency: South Coast Air Quality Management District

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-Construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

GHG-PDF-3: The Project will provide a minimum of 135 kilowatts of photovoltaic panels on the Project Site, unless additional kilowatts of photovoltaic panels become feasible due to additional area being added to the Project Site.

Enforcement Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

GHG-PDF-4: At least twenty (20) percent of the total code-required parking spaces provided for all types of parking facilities will be capable of supporting future electric vehicle supply equipment (EVSE). Plans will indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design will be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20 percent results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" will be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point. In addition, at least 5 percent of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5-percent requirement results in a fractional space, round up to the next whole number.

Enforcement Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

GHG-PDF-5: No later than six (6) months after the issuance of a Temporary Certificate of Occupancy for the Project, but prior to the issuance of the final Certificate of Occupancy for any building in the Project, the Project Applicant will provide to the lead agency, the City of Los Angeles, a calculation of the net additional emissions resulting from the construction of the Project (the "Construction Emissions"), to be calculated in accordance with the methodology agreed upon by the California Air Resources Board (CARB) in connection with the AB 900 certification of the Project (the "Agreed Methodology"). The Project Applicant will provide courtesy copies of the calculations to the CARB and the Governor's Office promptly following transmittal of the calculations to the City of Los Angeles. The Project Applicant will enter into one or more contracts to purchase voluntary carbon credits from a qualified GHG emissions broker in an amount sufficient to offset the Construction Emissions. The Project Applicant will provide courtesy copies of any such contracts to the CARB and the Governor's Office promptly following the execution of such contracts.

Enforcement Agency: City of Los Angeles Department of City Planning, California Air Resources Board, Governor's Office of Planning and Research

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Prior to occupancy

Monitoring Frequency: Once prior to occupancy

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning

GHG-PDF-6: Prior to issuance of any Certificate of Occupancy for any building in the Project, the Project Applicant or its successor will enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker (to be selected from an accredited registry), which contract, together with any previous contracts for the purchase of carbon credits, will evidence the purchase of carbon credits in an amount sufficient to offset the Operational Emissions attributable to such building in the Project, as well as all previously constructed buildings in the Project and will be calculated on a net present value basis for a 30-year useful life.

Enforcement Agency: City of Los Angeles Department of City Planning, California Air Resources Board

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Prior to occupancy

Monitoring Frequency: Once prior to occupancy

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning and subsequent issuance of Certificate of Occupancy

GHG-PDF-7: Prior to execution of the contract(s), the Project Applicant and its consultant will calculate the Operational Emissions, in accordance with the methodology described in the Project Applicant's "Application for Environmental Leadership Development Project," specifically the "Greenhouse Gas Emissions Methodology and Documentation" prepared by Eyestone Environmental.

Enforcement Agency: City of Los Angeles Department of City Planning, California Air Resources Board

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Prior to occupancy

Monitoring Frequency: Once prior to occupancy

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning

GHG-PDF-8: Once the City has had an opportunity to review and approve the methodology and associated calculations, the Project Applicant will provide copies of the calculation methodology to the California Air Resources Board (CARB) and Governor's Office of Planning and Research (OPR), which is then subject to a determination signed by the Executive Officer of CARB pursuant to the procedures set forth in Section 6 of OPR's Guidelines. If the Applicant has complied with all other requirements for issuance of a Certificate of Occupancy, the City will issue a Certificate of Occupancy upon receipt of the following: (1) a fully executed copy of the carbon offset purchase agreement(s); (2) a final CARB Determination that the Project will not result in any net additional GHG emissions; and (3) a copy of OPR's Certification Letter for the Project.

Enforcement Agency: City of Los Angeles Department of City Planning, California Air Resources Board, Governor's Office of Planning and Research

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Prior to occupancy

Monitoring Frequency: Once prior to occupancy

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning and subsequent issuance of Certificate of Occupancy

Cultural Resources

CUL-MM-1: The existing condition of the Crossroads of the World property shall be documented in accordance with Historic American Building Survey (HABS) guidelines and standards. Documentation shall include historic narrative, existing drawings and plans, and photographs of the property.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning and subsequent issuance of applicable building permit

CUL-MM-2: [As part of the Refined Project, the Early American Building will be retained in its existing condition. As such, this mitigation measure regarding relocation is no longer applicable and has been removed.]

CUL-MM-3: The connection of the proposed Building C1 to the Crossroads of the World "Early American Building," the Crossroads of the World "French Building," and the Bullinger Building shall be designed and completed in accordance with the Secretary of the Interior's Standards and Guidelines for Rehabilitation. The final design will require the approval of the Planning Department Office of Historic Resources.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

Action Indicating Compliance: Plan approval and issuance of applicable building permit

CUL-MM-4: The Crossroads of the World property shall be rehabilitated in accordance with the Secretary of the Interior's Standards and Guidelines for Rehabilitation. The final design will require the approval of the Planning Department Office of Historic Resources.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

Action Indicating Compliance: Plan approval and issuance of applicable building permit

CUL-MM-5: The Project shall include an interpretive program located on the Crossroads of the World property which informs the public about the history and of the Crossroads of the World property.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Post-construction

Monitoring Frequency: Annually

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning

CUL-MM-6: The Project design team shall consult with a preservation architect or other qualified professional to ensure that Building C1, Building C2, Building C3, Building D1, and Building E1 are designed and constructed in accordance with the Secretary of the Interior's Standards for Rehabilitation to ensure that the proposed new construction would protect the historic integrity of the Crossroads of the World property and adjacent historic resources, including the Bullinger Building, the First Baptist Church and the 1932 Art Deco office building at 1618 Las Palmas Avenue. The final design will require the approval of the Planning Department Office of Historic Resources.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

Action Indicating Compliance: Plan approval and issuance of applicable building permit

CUL-MM-7: The Project shall include a shoring plan to ensure the protection of adjacent historic resources, including, but not limited to, Crossroads of the World, the Bullinger Building, the First Baptist Church, and the 1932 Art Deco office building at 1618 Las Palmas

Avenue, from damage during construction due to underground excavation, vibration, and general construction procedures and to reduce the possibility of damage from vibration and settlement due to the removal of adjacent soil.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once per applicable building, at Project plan check

Action Indicating Compliance: Plan approval and issuance of applicable building permit

CUL-MM-8: A Historic Structure Report (HSR) shall be developed for the Crossroads of the World property to document its historic significance, identify character-defining features, and establish treatments for its continued preservation. The HSR shall be developed in accordance with *Preservation Brief 43, The Preparation and Use of Historic Structure Reports* available from the National Park Service.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

Action Indicating Compliance: Plan approval and issuance of applicable building permit

CUL-MM-9: The existing condition of the former Hollywood Reporter Building and the Bullinger Building shall be documented in accordance with Historic American Building Survey (HABS) guidelines and standards. Documentation shall include historic narrative, existing drawings and plans, and photographs of the property.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

Action Indicating Compliance: Plan approval and issuance of applicable building permit

CUL-MM-10: Planning and implementation of the rehabilitation and adaptive reuse of the former Hollywood Reporter Building and the Bullinger Building shall include consultation with a preservation architect or other qualified professional who meets the Secretary of the Interior's Professional Qualifications Standards for Historic Architecture to ensure minimal loss of original materials and character-defining features.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

Action Indicating Compliance: Plan approval and issuance of applicable building permit

CUL-MM-11: Rehabilitation of the former Hollywood Reporter Building and the Bullinger Building shall be designed and completed in accordance with the Secretary of the Interior's Standards and Guidelines for Rehabilitation. The final rehabilitation shall require the approval of the Planning Department Office of Historic Resources.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

Action Indicating Compliance: Plan approval and issuance of applicable building permit

CUL-MM-12: Rehabilitation of the former Hollywood Reporter Building and the Bullinger Building shall include an interpretive program written by a professional who meets the Secretary of the Interior's Professional Qualifications Standards for Historic Architecture, which informs the public about the history and original uses of the building.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Post-construction

Monitoring Frequency: Annually

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning

CUL-MM-13: A Historic Structure Report (HSR) shall be written for the former Hollywood Reporter Building and the Bullinger Building to document the historic significance, identify character-defining features, and establish treatments for continued preservation of the Buildings. The HSR shall be developed in accordance with Preservation Brief 43, The Preparation and Use of Historic Structure Reports available from the National Park Service.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once at Project plan check

Action Indicating Compliance: Plan approval and issuance of applicable building permit

CUL-MM-14: Prior to their demolition, the 1910 Craftsman house at 1542 McCadden Place, the 1907 vernacular house at 1547 McCadden Place, the 1912 Craftsman style duplex at 1606-08 Las Palmas Avenue, and the complex of three courtyard apartments at 6700-6718 Selma Avenue and 1535-1555 Las Palmas Avenue shall be documented in accordance with Historic American Building Survey (HABS) guidelines and standards.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to demolition

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning and subsequent issuance of applicable building permit

CUL-MM-15: Prior to the issuance of any demolition permits for historical resources located on the Project Site, the Applicant shall offer the historical buildings for potential relocation and rehabilitation, at a cost of \$1 (one dollar) each to any qualified party capable of relocating and rehabilitating the building(s) in conformance with the Secretary of the Interior's Standards for Rehabilitation. The Applicant shall advertise the buildings' availability for relocation and rehabilitation for a period of not less than thirty (30) days in the print and electronic editions of the Los Angeles Times, on at least two historic preservation web sites, such as "Historic Properties for Sale" (National Trust for Historic Preservation, historicrealestate.preservationnation.org) or HistoricForSale (historicforsale.com), and on the properties themselves. If a

relocating party is identified the following conditions shall be placed in the purchase and sale agreement for the particular building or structure: (1) The relocating party shall relocate and rehabilitate the building(s) in conformance with the Secretary of the Interior's Standards; (2) The relocating party shall prepare, in conjunction with a qualified Historic Architect who meets the Secretary of the Interior's Professional Qualifications Standards for Historic Architecture, a "Relocation and Rehabilitation Plan" that shall be reviewed and approved by the City of Los Angeles Office of Historic Resources prior to relocation; (3) The relocating party shall make every effort to relocate the historic building(s) to a new site or sites with similar orientation and setting to the original site(s); and (4) The Applicant and relocating party shall ensure that a plaque describing the building's historical significance, original location, and the date of the move shall be placed in a visible location on each relocated building. The purchase and sale agreement shall include a provision authorizing the City to monitor and enforce each of the above four (4) conditions against the Applicant and relocating party. All relocation and rehabilitation expenses, including land acquisition, shall be the responsibility of the relocating party.

Relocation efforts shall be documented in a written summary accompanied by copies of advertisements and notices, evidence of publication of such notices, and an explanation of the results of the relocation efforts. The Applicant shall submit this documentation to the City of Los Angeles Office of Historic Resources prior to the issuance of any demolition permits.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to demolition

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning and subsequent issuance of demolition permit

CUL-MM-16: If, after 15 (fifteen) days from the end of the 30-day relocation notification period, no qualified party has expressed interest in relocating and rehabilitating any of the historical resources on the Project Site that are slated for demolition, prior to the issuance of any demolition permit, the Applicant shall offer selected materials and features for salvage, including windows, doors, hardware, siding, bricks, plumbing fixtures, and lighting fixtures. The Applicant shall advertise the salvage availability for a period of not less than thirty (30) days in the print and electronic editions of the Los Angeles Times, on at least two historic preservation web sites, such as "Historic Properties for Sale" (National Trust for Historic

Preservation, historicrealestate.preservationnation.org) or HistoricForSale (historicforsale.com), and on the properties themselves. Salvage efforts shall be undertaken by the Applicant on behalf of interested parties. At the end of the 30-day salvage notification period, unclaimed materials and features shall be offered as a donation to a local non-profit organization, such as Habitat for Humanity, for re-use or sale.

Salvage efforts shall be documented in a written summary accompanied by copies of advertisements and notices, evidence of publication of such notices, and an explanation of the results of the salvage efforts. The Applicant shall submit this documentation to the City of Los Angeles Office of Historic Resources prior to the issuance of any demolition permits.

Enforcement Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Agency: City of Los Angeles Department of City Planning, Office of Historic Resources

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to demolition

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning and subsequent issuance of demolition permit

CUL-MM-17: A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities at the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The paleontologist shall then assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Project Applicant shall then comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

Enforcement Agency: Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: To be determined by consultation with paleontologist

Action Indicating Compliance: Submittal of compliance documentation prepared by qualified paleontologist

Hazards and Hazardous Materials

HAZ-PDF-1: A sub-slab soil gas sample will be obtained from beneath the footprint of the portion of Development Parcel C, where concentrations of PCEs were detected, to verify the PCE concentrations are below applicable standards.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction associated with Development Parcel C

Monitoring Frequency: Once at Project plan check prior to issuance of grading permit

Action Indicating Compliance: Plan approval and issuance of applicable grading permit

Noise

NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. The construction contractor will keep documentation on-site demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

NOI-PDF-2: Project construction will not include the use of driven (impact) pile systems.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Periodically during construction

Action Indicating Compliance: Field inspection sign-off

NOI-PDF-3: All outdoor mounted mechanical equipment will be enclosed or screened from off-site noise-sensitive receptors.¹

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

NOI-PDF-4: Outdoor amplified sound systems (e.g., speaker and stereo systems, amplification systems, or other sound-producing devices) will be designed so as not to exceed the maximum noise level of 90 dBA (Leq-1hr) at a distance of 25 feet from the amplified sound systems at the Building A1 main pool deck, 95 dBA (Leq-1hr) at the Building A1 roof deck lounge and pool, and roof deck, and 80 dBA (Leq-1hr) at a distance of 15 feet for the amplified sound systems at the Parcel B (Paseo West and outdoor courtyard between Buildings B3 and B5) and Parcel C (Paseo East and Crossroads outdoor courtyards). In addition, an 8-foot and 6-foot high glass wall will be provided at the Building A1 Main Pool Deck and Roof Deck, respectively. A noise consultant will provide written documentation that the design of the system complies with these noise levels.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Post-construction

Monitoring Frequency: Once at Project plan check; once at field inspection during operation

Action Indicating Compliance: Plan approval and field inspection sign-off and submittal of compliance report from noise consultant

¹ In accordance with the LA CEQA Thresholds Guide, noise-sensitive uses include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds and parks.

NOI-MM-1: A temporary and impermeable sound barrier shall be erected at the following locations. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

Along the western property line of the Project Site (Development Parcels A, B, and D) between the construction areas and existing Hollywood High School located on the west side of Highland Avenue, the residential use located on McCadden Place, and Egyptian Theater located on the west side of Las Palmas Avenue. The temporary sound barrier shall be designed to provide a minimum 13-dBA (for Hollywood High School) and a minimum 15-dBA (for the residential use on McCadden Place) noise reduction at ground level of the adjacent noise-sensitive receptors.

Along the northern property line of the Project Site (Development Parcels A, B, C, and E) between the construction areas and existing residential use located on Selma Avenue, Hollywood High School to the west, Egyptian Theater to the north, and Larchmont Charter School West Facility and Selma Avenue Elementary School to the northeast. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at ground level of the adjacent noise-sensitive receptors.

Along the southern property line of the Project Site (Development Parcels A, B, C, and E) between the construction area and residential use south of Development Parcel A and the motels on the south side of Sunset Boulevard, as well as the Blessed Sacrament Church and School to the south and east of Development Parcel E. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at ground level.

Along the eastern property line of the Project Site between the construction area and the Blessed Sacrament Church east of Development Parcels C and E. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at ground level.

Along the eastern property line of the Project Site (Development Parcel D) between the construction area and the residential use east (i.e., 1605 North Cherokee Avenue) of Development Parcel D. The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of the noise sensitive receptor.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction.

Monitoring Frequency: Once at Project plan check prior to issuance of grading permit; once during field inspection

Action Indicating Compliance: Plan approval and issuance of grading permit; field inspection sign-off

NOI-MM-2: Prior to start of construction, the Applicant shall retain the services of a structural engineer or a qualified professional to visit the on-site historic buildings (Crossroads of the World, Hollywood Reporter Building, Bullinger Building) and at adjacent off-site buildings to the south (single- and two-story commercial buildings on Highland Avenue and McCadden Place), north (First Baptist Church), and east (Blessed Sacrament Church) of the Project Site to inspect and document the apparent physical condition of the buildings' readily-visible features.

The Project Applicant shall retain the services of a qualified acoustical engineer to review proposed construction equipment and develop and implement a vibration monitoring system capable of documenting the construction-related ground vibration levels at the on-site and off-site historic buildings and the off-site commercial buildings during the Project site demolition and excavation, where heavy construction (e.g., large bulldozer and drill rig) would be operating within 20 feet of the affected buildings:

a) The vibration monitoring system shall measure and continuously store the peak particle velocity (PPV) in inch/second. Vibration data shall be stored on a one-second interval. The system shall also be programmed for two preset velocity levels: a warning level of 0.10 inch/second (PPV) for the on-site and off-site historic buildings and 0.15 inch/second (PPV) for the off-site buildings and a regulatory level of 0.12 inch/second (PPV) for the on-site and off-site historic buildings and 0.20 inch/second (PPV) for the off-site buildings. The system shall also provide real-time alert when the vibration levels exceed the two preset levels.

b) In the event the warning level (0.10 inch/second (PPV) for the on-site and off-site historic buildings and 0.15 inch/second (PPV) for the off-site buildings) is triggered, the contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level, including, but not limited to, halting/staggering concurrent activities and utilizing lower vibratory techniques.

c) In the event the regulatory level (0.12 inch/second (PPV) for the on-site and off-site historic buildings and 0.20 inch/second (PPV) for the off-site buildings) is triggered, the contractor shall halt the construction activities in the vicinity of the building and have the structural engineer or a qualified professional visually inspect the building for any damage. Results of the inspection must be logged. The contractor shall identify the source of vibration generation and provide feasible steps to reduce the vibration level. Construction activities may then restart.

d) In the event damage occurs to the historic buildings (finish materials) due to construction vibration, such materials shall be repaired and, if warranted, in a manner that meets the Secretary of the Interior's Standards.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; submittal of compliance report from noise consultant

NOI-MM-3: A 12-foot-high noise barrier wall shall be erected at the Project's eastern boundary (between the Crossroads of the World buildings along the eastern boundary and the Blessed Sacrament Church boundary). The noise barrier shall provide a minimum 5-dBA reduction at the Blessed Sacrament Church east of the Project Site. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety.

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check prior to issuance of grading permit; once during field inspection

Action Indicating Compliance: Plan approval; issuance of Certificate of Occupancy

NOI-MM-4: The ground level of the parking structure within Development Parcel E shall incorporate a minimum 3-foot-tall solid wall providing a minimum 3-dBA noise reduction. In addition, non-squeal paving finishes (i.e., paving finishes that are not smooth, often referred to as "broom finishes") shall be used within the proposed Project's new parking structure.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety.

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check prior to issuance of grading permit; once during field inspection

Action Indicating Compliance: Plan approval; issuance of Certificate of Occupancy

Public Services—Police Protection

PS-PDF-1: During construction, the Project Applicant will implement temporary security measures, including security barriers and fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, secure construction equipment, and minimize trespassing, vandalism, short-cut attractions, and attractive nuisances. Regular daily and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided to minimize trespassing, vandalism, and short-cut and other attractions. During construction activities, the Contractor will document the security measures; and the documentation will be made available to the Construction Monitor.

Enforcement Agency: City of Los Angeles Police Department; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

PS-PDF-2: During operation, the Project will incorporate a 24-hour/seven-day security program to ensure the safety of its residents and site visitors. The Project's security will include, but not be limited to, the following design features:

Installing and utilizing a 24-hour security camera network throughout the underground parking structures, the elevators, the common and amenity spaces, the lobby areas, and the rooftop and ground level outdoor open spaces. All security camera footage shall be maintained for at least 30 days, and such footage shall be provided to the LAPD, as needed;

Maintaining staff on-site, including at the lobby concierge desk and within the car valet areas. Designated staffers shall be dedicated to monitoring the Project's security cameras and directing staff to locations where any suspicious activity is viewed;

Controlling access to all building elevators, hotel rooms, residences, and resident-only common areas through an electronic key fob specific to each user;

Training staff on security policies for the Project's buildings. Duties of the security personnel would include, but not be limited to, assisting residents and visitors with site access, monitoring entrances and exits of buildings, managing and monitoring fire/life/safety systems, and patrolling the property; and

Maintaining unrestricted access to commercial/restaurant uses during business hours, with public access (except for authorized persons) prohibited after the businesses have closed.

Enforcement Agency: City of Los Angeles Police Department; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning

Monitoring Phase: Operation

Monitoring Frequency: Annually

Action Indicating Compliance: Documentation of private on-site security in compliance report

PS-PDF-3: Prior to the issuance of a building permit, the Project Applicant will consult with the Los Angeles Police Department's Crime Prevention Unit regarding the incorporation of crime prevention features appropriate for the design of the Project, such as the following:

Secure access points would be limited and located in areas of high visibilities;

Hallways and corridors would be uninterrupted and with no dark corners, as possible;

Outdoor areas would be visible from windows which allows for natural surveillance;

Clear transitional zones would be provided between public, semi-public and private spaces; and

Interior and exterior spaces would be well-lit with proper signage to direct flow of people and decrease opportunities for crime.

The Applicant shall implement the features identified during the consultation with the Los Angeles Police Department.

Enforcement Agency: City of Los Angeles Police Department, City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Pre-construction

Monitoring Frequency: Once prior to the issuance of applicable building permit

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning. Issuance of building permits.

PS-PDF-4: Prior to the issuance of a Certificate of Occupancy, the Project Applicant will submit a diagram of the Project Site to the Los Angeles Police Department West Bureau Commanding Officer that includes access routes and any additional information requested by the Los Angeles Police Department as necessary to facilitate police response.

Enforcement Agency: Los Angeles Police Department, City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of City Planning

Monitoring Phase: Post-construction

Monitoring Frequency: Once prior to the issuance of Certificate of Occupancy

Action Indicating Compliance: Submittal of compliance documentation and subsequent issuance of Certificate of Occupancy

Public Services—Fire Protection

PS-PDF-5: Automatic fire sprinkler systems will be installed in all new non-high-rise buildings (i.e., Buildings B2, B4, C1, C2, C3, and D1).

Enforcement Agency: Los Angeles Fire Department

Monitoring Agency: Los Angeles Fire Department

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; once during field inspection

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

Traffic, Access, and Parking

TRA-PDF-1: Construction Management Plan—Prior to the start of construction, the Project Applicant will prepare a Construction Management Plan and submit it to the Los Angeles Department of Transportation for review and approval. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advanced notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction

activities, including durations and daily hours of construction. Prohibition of construction-related vehicles, including construction worker parking, on adjacent residential streets or adjacent to a school property.

- Temporary pedestrian and vehicular traffic controls during all construction activities adjacent to Selma Avenue, Sunset Boulevard, Highland Avenue, and McCadden Place to ensure traffic safety on public rights-of-way. These controls will include, but are not limited to, flag people trained in pedestrian and student safety. Temporary traffic control during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Prohibition of staging or construction-related vehicles' parking, including worker-transport vehicles, on surrounding public streets or adjacent to a school property.
- Maintenance of safe and convenient routes for pedestrians, bicyclists, students, and school buses through such measures as alternate routing and protection barriers as appropriate, including along all identified LAUSD pedestrian routes to nearby schools.
- Scheduling of construction-related deliveries, haul trips, etc., so as to: (1) occur outside the commuter peak hours to the extent feasible; and (2) not impede school drop-off and pick-up activities and students using LAUSD's identified pedestrian routes to nearby schools.

Coordination with LAUSD site administrators and/or designated representatives to ensure that effective measures are employed to reduce construction-related effects to air quality, noise, existing pedestrian and school bus routes, and school drop off/pick up areas on the proximate LAUSD facilities.

- Coordination with public transit agencies to provide advanced notifications of stop relocations and durations.
- Advanced notification of temporary parking removals and duration of removals.
- Provision of detour plans to address temporary road closures during construction.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check prior to issuance of grading or building permit; once during field inspection

Action Indicating Compliance: Plan approval and issuance of grading permit; field inspection sign-off

TRA-MM-1: Transportation Demand Management (TDM) Program—The Project Applicant shall prepare and implement a TDM Program that includes strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. The TDM Program shall include design features, transportation services, education programs, and incentive programs intended to reduce the impact of traffic at the Project Site. The TDM Program shall be subject to review and approval by the Department of City Planning and LADOT. The TDM Program shall include, but are not limited to, the following strategies:

- Transportation Information Center, educational programs, kiosks and/or other measures;
- Provide a Transportation Management Office (TMO) with a TDM coordinator;
- Promotion and support of carpools and rideshare;
- Bicycle amenities, such as racks, showers, etc.;
- Guaranteed ride home program for employees;
- Flexible or alternative work schedules;
- Incentives for using alternative travel modes;
- Parking incentives and administrative support for formation of carpools/vanpools;
- Participate as a member in the future Hollywood Transportation Management Organization (TMO), when operational; and
- Bicycle improvements in the vicinity of the Project using a one-time fixed fee contribution of \$200,000 to be deposited into the City's Bicycle Plan Trust Fund.
- Space on-site for a future bicycle hub (requires coordination with LADOT to assess location for potential integration in a City bike-share program and to determine actual space requirements); and

- Execute a Covenant and Agreement to ensure that the TDM program will be maintained.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Construction

Monitoring Frequency: Once prior to issuance of applicable Certificate of Occupancy

Action Indicating Compliance: Approval of TDM program from Los Angeles Department of Transportation; issuance of Certificate of Occupancy; submittal of compliance report

TRA-MM-2: Transit System Improvements—The Project shall implement Transit System Improvements to improve existing transit services in the Project area through the establishment and contribution of a fixed fee of \$1,330,864 to a trust fund to be administered by LADOT. Transit system improvements would be focused along the Hollywood Boulevard and Santa Monica Boulevard corridors, and LADOT's Transit Section proposes \$865,386 to purchase one 35-foot zero emissions bus for the DASH Hollywood route, \$100,000 of maintenance cost expenses for three years, \$262,800 of driver salary expenses for three years, and \$102,678 of fuel expenses for three years.

In accordance with the Project's transportation mitigation plan, prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy, LADOT must receive the total transit system improvement funds from the Project Applicant.

Enforcement Agency: City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Construction

Monitoring Frequency: Once prior to issuance of Certificate of Occupancy

Action Indicating Compliance: Written-verification of payment of fees to the City of Los Angeles Department of Transportation and subsequent issuance of building permit

TRA-MM-3: Transportation Systems Management (TSM) Improvements—The Project shall contribute up to \$200,000 toward TSM improvements within the Hollywood-Wilshire District to replace existing Multi-Mode video fiber/fiber optic cables with approximately 30,000 feet

of high-capacity Single-mode data cables in existing conduits and upgrade eight closed-circuit television (CCTV) cameras/equipment in the Hollywood area. The new cables would be installed from an ATSAC hub located at Wilcox Avenue & De Longpre Avenue to Franklin Avenue/Highland Avenue, to Hollywood Boulevard/Highland Avenue, to the Hollywood Bowl/Highland Avenue and to Hollywood Boulevard/Vine Street. These cables would provide the network capacity for additional (CCTV) cameras to real-time video monitoring of intersection, corridor, transit, and pedestrian operations in Hollywood. These video fiber/fiber optic upgrades will be implemented either by the Applicant through the B-Permit process of the Bureau of Engineering, or through payment of a one-time fixed fee of \$200,000 to LADOT to fund the cost of the upgrades. If the upgrades are implemented by the Applicant through the B-Permit process, then these video fiber/fiber optic improvements must be guaranteed prior to the issuance of any building permit and completed prior to the issuance of any certificate of occupancy.

Enforcement Agency: City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Construction

Monitoring Frequency: Once prior to issuance of applicable Certificate of Occupancy

Action Indicating Compliance: Written verification of payment of fees to the City of Los Angeles Department of Transportation or implementation of TSM improvements; issuance of Certificate of Occupancy

The following mitigation measure is applicable to the Original Project as described in the Draft EIR and does not apply to the Project. Should the Project be approved, Mitigation Measure TRA-MM-5, below, would instead be implemented:

TRA-MM-4: Physical Improvements at Las Palmas Avenue and Sunset Boulevard for the Original Project—Physical improvements shall include widening and restriping along Sunset Boulevard to provide an exclusive westbound right-turn lane. This improvement would extend beyond the existing right-of-way and would require widening along the Project frontage, in addition to the removal of up to six on-street metered parking spaces on the north side of Sunset Boulevard between Las Palmas Avenue and Highland Avenue resulting from the realignment of Las Palmas Avenue.

In the event the above improvements do not receive the required approval by LADOT, a substitute mitigation measure of the Project's contribution to and participation in the Hollywood

Transportation Management Organization (TMO) would equally mitigate the significant impact at the intersection of Las Palmas Avenue and Sunset Boulevard under the Original Project. The Hollywood TMO would have a much wider reach than the Project's local TDM program (Mitigation Measure TRA-MM-1) and can result in much greater trip reduction benefits. Through the promotion of alternative modes of transportation, the Hollywood TMO would lead to as much as a 10-percent reduction in vehicular traffic for trips originating or ending within the Hollywood TMO area.

Enforcement Agency: City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Construction

Monitoring Frequency: Once prior to issuance of Certificate of Occupancy

Action Indicating Compliance: Issuance of Certificate of Occupancy

Mitigation Measure TRA-MM-5 is applicable to the Modified Project. Should the Original Project be approved, Mitigation Measure TRA-MM-4 above, would instead be implemented:

TRA-MM-5: Physical Improvements at Las Palmas Avenue and Sunset Boulevard for the Modified Project—Physical improvements shall include widening approximately 10 feet and restriping along the north leg of Las Palmas Avenue at Sunset Boulevard to provide one southbound left-turn lane, one shared through-right lane, and one right-turn lane.

Enforcement Agency: City of Los Angeles Department of Transportation; City of Los Angeles Department of City Planning

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Construction

Monitoring Frequency: Once prior to issuance of Certificate of Occupancy

Action Indicating Compliance: Issuance of Certificate of Occupancy

TRA-MM-6: Neighborhood Traffic Management Plan—The Project Applicant or its successors shall fund and coordinate implementation of LADOT's Neighborhood Traffic Management (NTM) Plan process for the Project, in an amount up to \$500,000. Eligible communities

shall include the residential neighborhoods within the boundaries listed below:

- Franklin Avenue to the north, Highland Avenue to the east, Sunset Boulevard to the south, and La Brea Avenue to the west.
- Franklin Avenue to the north, Cahuenga Boulevard to the east, Sunset Boulevard to the south, and Highland Avenue to the west.
- Sunset Boulevard to the north, La Brea Avenue to the east, Santa Monica Boulevard to the south, and Gardner Street to the west.
- Sunset Boulevard to the north, Highland Avenue to the east, Santa Monica to the south, and La Brea Avenue to the west.
- Sunset Boulevard to the north, Vine Street to the east, Santa Monica Boulevard to the south, and Highland Avenue to the west.
- Sunset Boulevard to the north, Van Ness Avenue to the east, Santa Monica Boulevard to the south, and Vine Street to the west.

The Project Applicant shall submit a NTM Implementation Plan to LADOT that sets key milestones and identifies a proposed process in developing a NTM plan for the six identified neighborhoods above. This implementation plan shall be formalized through an agreement between the Project Applicant and LADOT prior to the issuance of the first building permit for this Project. The agreement shall include a funding guarantee, an outreach process and budget for each of the identified neighborhoods, selection and approval criteria for any evaluated NTM measures, and an implementation phasing plan. The final NTM plan, if consensus is reached among the stakeholders, should be completed to the satisfaction of LADOT and should consider and evaluate neighborhood improvements that can offset the effects of added traffic, including street trees, sidewalks, landscaping, neighborhood identification features, and pedestrian amenities. It will be the Project Applicant's responsibility to implement any approved NTM measures through the Bureau of Engineering's B-permit process.

Enforcement Agency: City of Los Angeles Department of Transportation

Monitoring Agency: City of Los Angeles Department of Transportation

Monitoring Phase: Pre-Construction

Monitoring Frequency: Once prior to issuance of building permit

Action Indicating Compliance: Written agreement with the City of Los Angeles Department of Transportation and subsequent issues of building permit

Utilities and Service Systems—Water Supply and Infrastructure

UTL-PDF-1: In addition to regulatory requirements, the Project design will incorporate the following design features to support water conservation:

- High Efficiency Toilets with flush volume of 1.06 gallons of water per flush or less
- Waterless Urinals
- Showerheads with flow rate of 1.5 gallons per minute or less
- Rotating Sprinkler Nozzles for Landscape Irrigation—0.5 gallon per minute
- ENERGY STAR–certified Clothes Washers (Residential)
- ENERGY STAR–certified Dishwasher (Residential)
- Domestic Water Heating System located close proximity to point(s) of use that does not allow a delivery of over 0.6 gallon of water prior to the arrival of hot water
- Tankless and on-demand Water Heaters
- Cooling Tower Conductivity Controllers or Cooling Tower pH Conductivity Controllers
- Cooling Tower water supply all from non-potable water sources
- Water-Saving Pool Filter
- Pool/Spa recirculating filtration equipment
- Pool splash troughs around the perimeter that drain back into the pool
- Leak Detection System for swimming pools and Jacuzzi
- Drip/Subsurface Irrigation (Micro-Irrigation)—The majority of planting will be irrigated by sub-surface drip irrigation. Trees will be irrigated with bubblers at 0.5 gallon per minute with an irrigation efficiency of 0.81.
- Proper Hydro-zoning (groups plants with similar water requirements together)
- Zoned Irrigation

- Landscaping Contouring to minimize precipitation runoff—All excess runoff will be directed to a filtration planter before being discharged to the street.
- Drought Tolerant Plants—78 percent of total landscaping
- Rainwater Harvesting

Weather-based or soil moisture-based controller for irrigation

Enforcement Agency: City of Los Angeles Department of Water and Power; City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; construction

Monitoring Frequency: Once at Project plan check; once prior to issuance of Certificate of Occupancy

Action Indicating Compliance: Plan approval and issuance of applicable building permit; issuance of Certificate of Occupancy

UTL-PDF-2: The Project will reduce outdoor water use by a minimum of 50 percent from the calculated baseline at peak watering month by installing efficient irrigation.

Enforcement Agency: City of Los Angeles Department of Water and Power

Monitoring Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety

Monitoring Phase: Pre-construction; Post-Construction

Monitoring Frequency: Once at plan check to show irrigation system; annually

Action Indicating Compliance: Submittal of compliance report

Utilities and Service Systems—Solid Waste

UTL-PDF-3: The Project will provide for clearly marked, durable on-site recycling containers to promote the recycling of paper, metal, glass, and other recyclable materials and adequate storage areas for such containers during construction and after the building is occupied.

Enforcement Agency: City of Los Angeles Department of City Planning; City of Los Angeles Department of Public Works Bureau of Sanitation

Monitoring Agency: City of Los Angeles Department of Public Works, Bureau of Sanitation

Monitoring Phase: Operation

Monitoring Frequency: Annually

Action Indicating Compliance: Submittal of compliance documentation to City of Los Angeles Department of City Planning

UTL-PDF-4: Building materials with a minimum of 10 percent recycled-content will be used for the construction of the Project.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

UTL-PDF-5: During construction, the Project will implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous construction debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area.

Enforcement Agency: City of Los Angeles Department of Building and Safety

Monitoring Agency: City of Los Angeles Department of Building and Safety

Monitoring Phase: Construction

Monitoring Frequency: Once during field inspection

Action Indicating Compliance: Field inspection sign-off

26. **Construction Mitigation Conditions** - Prior to the issuance of a grading or building permit, or the recordation of the final map, the subdivider shall prepare and execute a Covenant and Agreement (Planning Department General Form CP-6770) in a manner satisfactory to the Planning Department, binding the subdivider and all successors to the following:

CM-1. That a sign be required on-site clearly stating a contact/complaint telephone number that provides contact to a live voice, not a recording or voice mail, during all hours of construction, the construction site address, and the tract map number. **YOU ARE REQUIRED TO POST THE SIGN 7 DAYS BEFORE CONSTRUCTION IS TO BEGIN.**

- a. Locate the sign in a conspicuous place on the subject site or structure (if developed) so that the public can easily read it. The sign must be sturdily attached to a wooden post if it will be freestanding.
- b. Regardless of who posts the site, it is always the responsibility of the applicant to assure that the notice is firmly attached, legible, and remains in that condition throughout the entire construction period.
- c. If the case involves more than one street frontage, post a sign on

each street frontage involved. If a site exceeds five (5) acres in size, a separate notice of posting will be required for each five (5) acres, or portion thereof. Each sign must be posted in a prominent location.

- CM-2. 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.
- CM-3. The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.
- CM-4. All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- CM-5. All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- CM-6. 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.
- CM-7. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- CM-8. The project shall comply with the City of Los Angeles Noise Ordinance Nos. 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.
- CM-9. Construction and demolition shall be restricted to the hours of 7:00 am to 9:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturday.
- CM-10. Construction and demolition activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- CM-11. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.
- CM-12. The project sponsor shall comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which insure an acceptable interior noise environment.
- CM-13. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), construct diversion dikes to channel runoff around the site. Line channels with grass or roughened pavement to reduce runoff velocity.
- CM-14. Incorporate appropriate erosion control and drainage devices to the satisfaction of the Building and Safety Department shall be incorporated, such as 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. These will shield and bind the soil.

- CM-15. Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.
- CM-16. All waste shall be disposed of properly. Use appropriately labeled recycling bins to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non-recyclable materials/wastes must be taken to an appropriate landfill. Toxic wastes must be discarded at a licensed regulated disposal site.
- CM-17. Clean up leaks, drips and spills immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- CM-18. Do not hose down pavement at material spills. Use dry cleanup methods whenever possible.
- CM-19. Cover and maintain dumpsters. Place uncovered dumpsters under a roof or cover with tarps or plastic sheeting.
- CM-20. Use gravel approaches where truck traffic is frequent to reduce soil compaction and limit the tracking of sediment into streets.
- CM-21. Conduct all vehicle/equipment maintenance, repair, and washing away from storm drains. All major repairs are to be conducted off-site. Use drip pans or drop cloths to catch drips and spills.

DEPARTMENT OF CITY PLANNING-STANDARD CONDOMINIUM CONDITIONS

- C-1. That approval of this tract constitutes approval of model home uses, including a sales office and off-street parking. Where the existing zoning is (T) or (Q) for multiple residential use, no construction or use shall be permitted until the final map has recorded or the proper zone has been effectuated. If models are constructed under this tract approval, the following conditions shall apply:
1. Prior to recordation of the final map, the subdivider shall submit a plot plan for approval by the Division of Land Section of the Department of City Planning showing the location of the model dwellings, sales office and off-street parking. The sales office must be within one of the model buildings.
 2. All other conditions applying to Model Dwellings under Section 12.22-A, 10 and 11 and Section 17.05-O of the LAMC shall be fully complied with satisfactory to the Department of Building and Safety.
- C-2. Prior to the recordation of the final map, the subdivider shall pay or guarantee the payment of a park and recreation fee based on the latest fee rate schedule applicable. The amount of said fee to be established by the Advisory Agency in accordance with LAMC Section 17.12 and is to be paid and deposited in the trust accounts of the Park and Recreation Fund.
- C-3. Prior to obtaining any grading or building permits before the recordation of the final map, a landscape plan, prepared by a licensed landscape architect,

shall be submitted to and approved by the Advisory Agency in accordance with CP-6730.

In the event the subdivider decides not to request a permit before the recordation of the final map, a covenant and agreement satisfactory to the Advisory Agency guaranteeing the submission of such plan before obtaining any permit shall be recorded.

- C-4. In order to expedite the development, the applicant may apply for a building permit for an apartment building. However, prior to issuance of a building permit for apartments, the registered civil engineer, architect or licensed land surveyor shall certify in a letter to the Advisory Agency that all applicable tract conditions affecting the physical design of the building and/or site, have been included into the building plans. Such letter is sufficient to clear this condition. In addition, all of the applicable tract conditions shall be stated in full on the building plans and a copy of the plans shall be reviewed and approved by the Advisory Agency prior to submittal to the Department of Building and Safety for a building permit.

OR

If a building permit for apartments will not be requested, the project civil engineer, architect or licensed land surveyor must certify in a letter to the Advisory Agency that the applicant will not request a permit for apartments and intends to acquire a building permit for a condominium building(s). Such letter is sufficient to clear this condition.

BUREAU OF ENGINEERING - STANDARD CONDITIONS

- S-1. (a) That the sewerage facilities charge be deposited prior to recordation of the final map over all of the tract in conformance with Section 64.11.2 of the LAMC.
- (b) That survey boundary monuments be established in the field in a manner satisfactory to the City Engineer and located within the California Coordinate System prior to recordation of the final map. Any alternative measure approved by the City Engineer would require prior submission of complete field notes in support of the boundary survey.
- (c) That satisfactory arrangements be made with both the Water System and the Power System of the Department of Water and Power with respect to water mains, fire hydrants, service connections and public utility easements.
- (d) That any necessary sewer, street, drainage and street lighting easements be dedicated. In the event it is necessary to obtain off-site easements by separate instruments, records of the Bureau of Right-of-Way and Land shall verify that such easements have been obtained. The above requirements do not apply to easements of off-site sewers to be provided

by the City.

- (e) That drainage matters be taken care of satisfactory to the City Engineer.
- (f) That satisfactory street, sewer and drainage plans and profiles as required, together with a lot grading plan of the tract and any necessary topography of adjoining areas be submitted to the City Engineer.
- (g) That any required slope easements be dedicated by the final map.
- (h) That each lot in the tract complies with the width and area requirements of the Zoning Ordinance.
- (i) That 1-foot future streets and/or alleys be shown along the outside of incomplete public dedications and across the termini of all dedications abutting unsubdivided property. The 1-foot dedications on the map shall include a restriction against their use of access purposes until such time as they are accepted for public use.
- (j) That any 1-foot future street and/or alley adjoining the tract be dedicated for public use by the tract, or that a suitable resolution of acceptance be transmitted to the City Council with the final map.
- (k) That no public street grade exceeds 15%.
- (l) That any necessary additional street dedications be provided to comply with the Americans with Disabilities Act (ADA) of 1990.

S-2. That the following provisions be accomplished in conformity with the improvements constructed herein:

- (a) Survey monuments shall be placed and permanently referenced to the satisfaction of the City Engineer. A set of approved field notes shall be furnished, or such work shall be suitably guaranteed, except where the setting of boundary monuments requires that other procedures be followed.
- (b) Make satisfactory arrangements with the Department of Transportation with respect to street name, warning, regulatory and guide signs.
- (c) All grading done on private property outside the tract boundaries in connection with public improvements shall be performed within dedicated slope easements or by grants of satisfactory rights of entry by the affected property owners.
- (d) All improvements within public streets, private street, alleys and easements shall be constructed under permit in conformity with plans and specifications approved by the Bureau of Engineering.

- (e) Any required bonded sewer fees shall be paid prior to recordation of the final map.
- S-3. That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

- (a) Construct on-site sewers to serve the tract as determined by the City Engineer.
- (b) Construct any necessary drainage facilities.
- (c) Install street lighting facilities to serve the tract as required by the Bureau of Street Lighting.

IMPROVEMENT CONDITION: Construct new street lights: two (2) on Las Palmas Ave. If street widening per BOE improvement conditions, relocate and upgrade street lights; two (2) on Highland Ave., eight (8) on Selma Ave., one (1) on McCadden Pl., three (3) on Las Palmas Ave., and five (5) on Sunset Bl.

Notes: The quantity of street lights identified may be modified slightly during the plan check process based on illumination calculations and equipment selection.

Conditions set: 1) in compliance with a Specific Plan, 2) by LADOT, or 3) by other legal instrument excluding the Bureau of Engineering conditions, requiring an improvement that will change the geometrics of the public roadway or driveway apron may require additional or the reconstruction of street lighting improvements as part of that condition.

- (d) Plant street trees and remove any existing trees within dedicated streets or proposed dedicated streets as required by the Street Tree Division of the Bureau of Street Maintenance. All street tree plantings shall be brought up to current standards. When the City has previously been paid for tree planting, the subdivider or contractor shall notify the Street Tree Division (213-485-5675) upon completion of construction to expedite tree planting.
- (e) Repair or replace any off-grade or broken curb, gutter and sidewalk satisfactory to the City Engineer.
- (f) Construct access ramps for the handicapped as required by the City Engineer.
- (g) Close any unused driveways satisfactory to the City Engineer.
- (h) Construct any necessary additional street improvements to comply with the Americans with Disabilities Act (ADA) of 1990.
- (i) That the following improvements be either constructed prior to recordation of the final map or that the construction be suitably guaranteed:

a) Improve McCadden Place being dedicated and adjoining (on both sides) subdivision by the construction of additional concrete sidewalks to complete 12-foot full width concrete sidewalks with tree wells.

b) Improve Las Palmas Avenue being dedicated and adjoining the Ground Lot No. 1, 2 and Ground Lot No. 4 of subdivision by the construction of additional concrete sidewalks to complete 13-foot full width concrete sidewalks (on both sides adjoining the project) with tree wells.

c) Improve Selma Avenue adjoining subdivision by the reconstruction of the existing concrete sidewalk to provide a new full width concrete sidewalk with tree wells.

d) Improve Sunset Boulevard and Highland Avenue adjoining the Ground Lot No. 1, 2 and Ground Lot No. 3 of subdivision by the construction of additional concrete sidewalks to complete 13-foot full width concrete sidewalks (adjoining the project) with tree wells.

Note: Any street widening for above streets shall be in accordance with LADOT requirements.

NOTES:

The Advisory Agency approval is the maximum number of units permitted under the tract action. However the existing or proposed zoning may not permit this number of units.

Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power, Power System, to pay for removal, relocation, replacement or adjustment of power facilities due to this development. The subdivider must make arrangements for the underground installation of all new utility lines in conformance with LAMC Section 17.05N.

The final map must record within 36 months of this approval, unless a time extension is granted before the end of such period.

The Advisory Agency hereby finds that this tract conforms to the California Water Code, as required by the Subdivision Map Act.

The subdivider should consult the Department of Water and Power to obtain energy saving design features which can be incorporated into the final building plans for the subject development. As part of the Total Energy Management Program of the Department of Water and Power, this no-cost consultation service will be provided to the subdivider upon his request.

FINDINGS OF FACT (CEQA)

I. INTRODUCTION

The Environmental Impact Report (EIR), consisting of the Draft EIR, the Final EIR and the Errata to the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and components of the Crossroads Hollywood Project (Project) located at 1540-1552 Highland Avenue; 6660 Selma Avenue; 6663-6675 Selma Avenue; 6700-6760 Selma Avenue; 1542-1546 McCadden Place; 1543-1553 McCadden Place; 1500-1570 Las Palmas Avenue; 1501-1573 Las Palmas Avenue; 1600-1608 Las Palmas Avenue; 6665-6713 1/2 Sunset Boulevard, Los Angeles, California 90028, assessor parcel numbers 5547-014-(026-028); 5547-019-(019, 020, 022, 023, 032, 035); 5547-020-(001-005, 007, 008, 025, 027-029, 036, 045) (Project Site). The mixed-use Site includes approximately 1,381,000 square feet (including the square footages within the former Hollywood Reporter Building, the Bullinger Building and the Crossroads of the World complex, as described below) on an approximately 8.3-acre Site containing 30 individual parcels over four City blocks located within an identified High Quality Transit Area and Transit Priority Area.

The Project includes eight new mixed-use buildings, including residential, hotel, commercial/retail, entertainment and restaurant uses, and a small stand-alone, one-story commercial/retail-only building along the eastern edge of the Crossroads of the World complex on Parcels A through D of the Project Site, and a stand-alone parking structure on Parcel E of the Project Site providing 473 parking spaces that was added as a modification to the original Project and Project Site, as described below. Three of the buildings are high-rise buildings, ranging in height from 26 to 31 stories. The remaining buildings will be one to six stories-plus-mezzanines tall. The Project preserves and rehabilitates the Crossroads of the World complex, the former Hollywood Reporter Building and the Bullinger Building. The Project design preserves the historic setting of the Crossroads of the World complex by distributing density and height to portions of the Project Site located away from the complex.

The Project includes approximately 950 residential units, 308 hotel rooms, and approximately 190,000 square feet of commercial space, for a total of approximately 1,381,000 square feet (including Crossroads of the World, the former Hollywood Reporter Building, which was designated as a Los Angeles Historic-Cultural Monument on November 7, 2017, and the Bullinger Building). The residential units will all be rental apartments. In addition, 105 units of the 950 residential units will be set aside for Very Low Income Households. The provision of 105 units satisfies and exceeds the one-to-one replacement requirement for the 82 existing units covered by the Rent Stabilization Ordinance. The Project also includes a new pedestrian paseo design that increases connectivity between the Crossroads of the World complex and other Project buildings and the surrounding community. The Project also provides a variety of recreational amenities, open space, and green space. The Project's landscaped public walkways promote access through the Project Site, and open space is provided in accordance with the open space provisions for new residential Projects set forth in LAMC Section 12.21-G.

The Project incorporates features to support and promote environmental sustainability including, without limitation, energy-efficient buildings, pedestrian- and bicycle-friendly Site design, and water conservation and waste reduction features that will assist the Project in becoming certified under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)-CS® or LEED-NC® Rating System and the Gold Rating under LEED 2009 (v3) or the Silver Rating under LEED v4 rating system.

The Project also utilizes sustainable planning and building strategies and incorporates the use of environmentally friendly materials, such as non-toxic paints and recycled finish materials, whenever feasible.

Further, on November 29, 2016, the Governor certified the Project as an eligible Environmental Leadership Development Project under AB 900, and, on December 1, 2016, the Governor's OPR forwarded the Governor's determination to the Joint Legislative Budget Committee. According to Public Resources Code Section 21184(b)(2)(C), if "the Joint Legislative Budget Committee fails to concur or nonconcur on a determination by the Governor within 30 days of the submittal, the leadership Project is deemed to be certified." Since the Joint Legislative Budget Committee failed to concur or nonconcur by December 31, 2016, the Project has been deemed certified as an Environmental Leadership Development Project.

Project construction will occur in phases over approximately 48 months and is anticipated to be completed in 2022.

II. ENVIRONMENTAL DOCUMENTATION BACKGROUND

The Project was reviewed by the Los Angeles Department of City Planning, Environmental Analysis Section (serving as Lead Agency) in accordance with the requirements of the California Environmental Quality Act ("CEQA", codified at Pub. Res. Code §§ 21000 et seq.). The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines (14 Cal. Code Regs. §§ 15000 et seq.). Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation (NOP) to State, regional and local agencies, and members of the public for a 33-day period commencing on October 22, 2015. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the Project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR.

Written comment letters responding to the NOP were submitted to the City by various public agencies, interested organizations and individuals. Written comments were provided by mail, e-mail or submittal at the NOP scoping meeting. The NOP, Initial Study, and NOP comment letters are included in Appendix A of the Draft EIR.

The Draft EIR evaluated in detail the potential effects of the Original Project. The Original Project consisted of the rehabilitation of Crossroads of the World and removal all other existing uses on the Project Site, and the development of eight new mixed-use buildings with residential, hotel, commercial/retail, office, entertainment, and restaurant uses, and a new stand-alone, one-story commercial/retail building totaling 1,432,500 square feet of floor area consisting of 950 residential units, 308 hotel rooms, approximately 95,000 square feet of office uses, and approximately 185,000 square feet of commercial/retail uses. The Draft EIR also analyzed the effects of a reasonable range of six alternatives to the Original Project, including a "No Project" alternative. The Draft EIR for the Project (State Clearinghouse No. 2015101073), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines. The Draft EIR was circulated for a 76-day public comment period beginning on May 11, 2017, and ending on July 26, 2017. Copies of the written comments received are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the

City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section II, Responses to Comments, of the Final EIR.

Following publication of the Draft EIR, the Applicant made minor revisions to the original Project Site and to the Original Project in response to comments on the Draft EIR, including, but not limited to, revisions primarily required to add the preservation and rehabilitation of the former Hollywood Reporter Building, the addition of a stand-alone parking structure, the retention of the existing alignment of Las Palmas Avenue, the retention of the Bullinger Building, and maintenance of the current location of the Early American Building (hereafter referred to as the Project). Specific details regarding these revisions are included in Section III, Revisions, Clarifications and Corrections and Errata. The City released the Final EIR for the Project on May 4, 2018, which is hereby incorporated by reference in full. The Final EIR ("EIR") is comprised of (1) the Draft EIR dated April 2017, (2) the comments received on the Draft EIR and the City's responses to them, (3) an Errata dated August 2018 (described below) and (4) a list of persons, organization and public agencies commenting on the draft EIR. The EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and components of the Project. The EIR addresses the environmental effects associated with implementation of the Project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR during the public review period. Responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the EIR pursuant to CEQA Guidelines Section 15088(b). In addition, all individuals who commented on the Draft EIR also received a copy of the Final EIR. The Final EIR was also made available for review on the City's Department of City Planning website. Hard copies of the Final EIR were also made available at four libraries and the City Department of Planning. Notices regarding availability of the Final EIR were sent to those within a 500-foot radius of the Project Site, as well as individuals who commented on the Draft EIR, attended the NOP scoping meeting, or provided comments during the NOP comment period.

Following publication of the Final EIR, the City prepared an Errata to the Final EIR, posted on the Department of City Planning website on August 10, 2018, which is hereby incorporated by reference in full to address minor changes and refinements to the Modified Project, referred to in the Errata as the Refined Project. Specifically, the Modified Project described in Section I – Introduction, page I-1, in the Final EIR has been refined to include the retention of the Early American Building in its existing location within the existing Crossroads of the World Complex; to incorporate the existing Bullinger Building; to reorient the proposed hotel within Development Parcel A; to refine the mix of commercial uses within Development Parcel C to include a market and movie theater and entertainment venue with no increase in overall square footage; to include a refined pedestrian paseo that connects the existing Crossroads of the World complex and other Refined Project buildings with the surrounding community; and to increase the height of the parking structure proposed within Development Parcel E from 60 feet to 68 feet. In exchange for the addition of the movie and entertainment venue (the market was part of the Original Project), the Original Project's proposed 95,000 square feet of offices uses were eliminated. In addition, there were reductions in the square footage of restaurant, market and retail space, as shown on Table 1 of the Errata, page 5. All of the information added to the Final EIR pursuant to the Errata merely clarifies, corrects, adds to, or makes

insignificant modifications to information in the Draft and Final EIR. The Errata does not change any of the basic findings or conclusions of the Final EIR, does not constitute "significant new information" pursuant to CEQA Guidelines Section 15088.5(a), and does not require recirculation of the Draft EIR. This Errata, combined with the Draft EIR dated April 2017, the comments received on the Draft EIR and the City's responses to them, and a list of persons, organization and public agencies commenting on the draft EIR, comprise the Final EIR.

A duly noticed joint public hearing for the Project was held on May 15, 2018, which was conducted by both the Hearing Officer on behalf of the City Planning Commission, and the Deputy Advisory Agency on behalf of the Advisory Agency to consider the vesting tentative tract map. Several letters were submitted at the joint public hearing, specifically from UNITE HERE Local 11 and Chatten Brown & Carstens LLP, which made the following statements regarding the EIR. In addition, public comments were made at the joint public hearing regarding the EIR. A response is provided below after every comment.

1. UNITE HERE Local 11

Comment: The Project is required to replace all 82 existing RSO units with either all RSO units, or one-to-one replacement with affordable units or 20 percent affordable units, whichever is greater. The Project's intensity of land uses and conflicts with the general plan should entice the Project Applicant to apply the RSO to the entire Site. The Project at the least should include as many as 190 units to comply with the City's Rent Stabilization Ordinance (RSO).

Response: The comment does not address the adequacy of the Final EIR. While the current RSO, which went into effect June 4, 2017, could require the one-to-one replacement with affordable housing or 20 percent affordable units, whichever is greater, that is not the ordinance that is applicable to the Project. The application for the Project's vesting tentative tract map was deemed complete on February 11, 2016, prior to the change in the RSO (Ordinance No. 178,848). As such, the Project satisfies the RSO in effect at the time, which required one-to-one replacement or 20% of the newly constructed units, whichever is less. Specifically, the Project complies with the one-to-one replacement for the demolition of the existing 82 RSO units and will reserve a total of 105 units for Very Low Income Households, in excess of the requirement.

Comment: There must be a cumulative analysis of the effects of dozens of new alcohol-charged venues permitted in addition to the Project's Master Conditional Use request to permit the on-Site and off-Site sale, dispensing and consumption of a full line of alcoholic beverages in connection with a total of 22 establishments. The Final EIR Appendix 4 (Supplement to the Traffic Analysis) analyzes 70,000 square feet of restaurant uses, but the Modified Project identifies 140,000 square feet of potential restaurant uses. An additional 24,000 square feet of Entertainment Venue use has not been studied. The Project does not "square" with the General Plan Framework.

Response: The potential environmental impacts associated with the Project's alcohol-related uses have been fully addressed in the EIR. Specifically, potential noise impacts from the outdoor areas of the Project are evaluated on pages IV.I-46 through IV.I-49 of Section IV.I, Noise, of the Draft EIR. The estimated noise levels were calculated assuming that all of the outdoor spaces will be fully occupied and operating concurrently, to

represent a worst-case noise analysis. As demonstrated in the Draft EIR, with incorporation of a Project design feature limiting the noise levels of amplified sound systems and implementation of a mitigation measure providing for a sound barrier in one location, impacts associated with the outdoor uses will be less than significant. As with the Project, any of the related projects' outdoor uses in the Project Site vicinity will also be required to comply with the City's Noise Ordinance, which considers a noise level increase from certain regulated noise sources of 5 dBA over the existing or presumed ambient noise level at an adjacent property line to be a violation. See also Chapter II, Responses to Comments, Section B, Topical Responses, Topical Response 6, Master Conditional Use Permit Request, of the Final EIR.

The comment that the Project as modified (Modified Project) includes 140,000 square feet (sf) of restaurant space is inaccurate. As listed on Table III-1, Modified Project vs. Original Project, of the Final EIR, Section III – Revisions, Clarifications, and Corrections to the Draft EIR, page III-5, the 140,000 is the *total* of the retail, which includes restaurant uses and the existing square footage of the Hollywood Reporter Building and Crossroads of the World complex (see footnote "a" of that table). The accurate Modified Project information is also included in the Traffic Memo, which states that the Modified Project includes 70,000 sf of total restaurant space throughout the Modified Project. The specific restaurant tenants have not been determined at this time. The statement that the impacts of 24,000 square feet of entertainment venue use and 26,000 square feet movie theater use have not been studied is also incorrect, as the impacts of approximately 56,000 square feet of entertainment venue and movie theater use were studied on Development Parcel C in the Draft EIR as part of Alternative 3: Additional Project Site Alternative (see Chapter V, Alternatives, Section C, Alternative 3: Additional Project Site Alternative, at pages V-90 and V-91, where these uses are described as part of Alternative 3's description). In addition, the impacts of these uses, and the other refinements to the Project that resulted in the Modified Project, are analyzed in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of the Final EIR (including pages III-42 through III-91). Finally, the proposed hotel and restaurant uses are consistent with the uses permitted by the General Plan for the Project Site; i.e., the Project Site's Regional Center Commercial land use designation.

Comment: The supplemental traffic analysis (Appendix 4 of the Final EIR) misidentifies the Modified Project's proposed uses and undercounts trip generation from the hotel, entertainment, and restaurant uses.

Response: The Project description analyzed in the technical memorandum contained in Appendix 4 of the Final EIR (Traffic Memo) is the same as the Modified Project's Project description set forth on page III-3 of Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of the Final EIR. Specifically, the Project description includes 950 residential units, 308 hotel rooms, and 190,000 square feet of commercial uses (including retail, restaurant, entertainment, and cinema uses). A comparison of the Modified Project and Original Project is provided in Table III-1, Modified Project vs. Original Project, in Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of the Final EIR. The methodology and assumptions related to trip-generation rates, traffic-related land use characteristics and identification of similar land use categories, etc., for the hotel, entertainment and restaurant uses that are part of the Modified Project are consistent with those used for the Traffic Study and Draft EIR for the Original Project, which were reviewed and approved by the LADOT. As described in the Traffic Study and Draft EIR,

as well as the supplemental Traffic Memo, the numbers of trips generated by the Original Project and by the Modified Project were estimated using the rates published in ITE's Trip Generation, 9th Edition (2012). These rates are based on surveys of similar land uses at sites around the country. As further described in the Traffic Study, the land use category and trip-generation rate provided in the ITE Trip Generation for hotel uses include not only the hotel use, but also ancillary uses in the hotel, including conference areas, meeting rooms, lobby lounge and bar, rooftop bar and lounge, guest amenities, and retail and restaurant space. Further, the land use category and trip-generation rate for shopping centers, which was used to estimate the trips generated by the commercial component of both the Original and Modified Projects, include not only retail uses, but also entertainment, theater, restaurant and food and beverage, banks, small offices, services, etc., uses that are common within shopping center developments. Although the ITE Trip Generation includes restaurant-related uses as part of shopping center and hotel uses, and considers the trips generated by such restaurant-related uses to be subsumed within the trip-generation rates for the shopping centers and hotels in which they are located, the trip generation of the restaurant uses within the shopping center and hotel uses in the Original Project and Modified Project were accounted for separately. Therefore, the estimated trip-generation forecast provided in the supplemental traffic analysis is likely overstated, rather than understated. The comment does not provide any evidence of new impacts or how the calculations are flawed.

Comment: The Final EIR does not incorporate further communication with Caltrans.

Response: The City has consulted with Caltrans throughout the EIR process (i.e., the NOP process, LADOT MOU, and public comment period) to prepare an adequate traffic analysis and have discussed the preparation of the traffic study and the analysis, potential impacts, and improvement measures for the state facilities. A full analysis of Caltrans facilities based on Caltrans' established guidelines was included in the EIR as requested in Caltrans' NOP comment letter dated November 23, 2015. Furthermore, Caltrans' comment letter on the Draft EIR (Comment Letter No. 1, Comment No. 1 6) specifically refers to the coordination throughout the process, and cites meetings held (June 6, 2017) to discuss the traffic analysis and future traffic improvement measures on the state facilities.

Comment: The Project will generate 14,500 new trips per day, and there will be five significant intersection impacts above the threshold of significance and at LOS F, even with the proposed TDM.

Response: The comment provides inaccurate information related to the number of trips generated. The accurate trip generation is shown in Table 5 of the Traffic Memo, which states that the Modified Project will result in a net increase of 12,640 net new daily trips, not 14,500 new trips per day. The traffic analysis included in the Traffic Memo adequately analyzes the traffic impacts of the Modified Project under the applicable thresholds of significance. As described in the Traffic Memo, the Modified Project like the Original Project results in potentially significant impacts prior to mitigation. Similar to the Original Project, a range of transportation mitigation measures were considered for the Modified Project, including implementation of a Transportation Demand Management (TDM) Plan, Transportation System Management Improvements, Transit System Improvements, and physical improvement measures to mitigate the identified potential impacts and to improve traffic operations in the area. Similar to the Original Project, the identified traffic

mitigation measures will reduce the Modified Project's impacts to less-than-significant levels at the majority of the significantly impacted intersections, but impacts at five intersections will remain significant and unavoidable. It should be noted, however, that the City's significance criteria is based on a sliding scale method for calculating the level of impact due to traffic generated by a proposed Project, which considers not only the LOS, but also the Project-related increase in intersection operations (defined by the incremental change in volume-to-capacity ratio). The intersection operation of LOS F alone is not a defined threshold for identifying the significance of impacts. The comment provides no evidence of a new significant impact.

Comment: Credits applied for internal capture and pass-by trips are misapplied. The credits are all associated with uses in restaurants and shopping center portions. The credits are over-applied or over-valued.

Response: The trip-generation forecast was prepared in accordance with LADOT's Traffic Study Policies and Procedures. The Traffic Study Policies and Procedures include provisions for potential trip-reduction credits that should be considered when estimating the number of trips generated by a Project (e.g., internal capture, transit, walk-in, pass-by, etc.). The ITE Trip Generation, 9th Edition and ITE Trip Generation Handbook, 3rd Edition (2014) include instructions to traffic engineers, methodologies, guidelines, and considerations when determining the potential trip generation of a Project. As defined in ITE's Trip Generation Handbook, 3rd Edition, internal capture trips account for the interaction among two or more land uses within a development Site, particularly where the trip can be made by walking. Pass-by trips account for trips made as an intermediate stop on the way from an origin to a primary trip destination. These trips are already traveling on the roadway system and, therefore, are not new trips in the area. Based on other trip-generation studies, professional engineering guidelines, and engineering judgment, the internal capture and pass-by reductions related to the restaurant uses are reasonable, acceptable, and supported by substantial evidence. However, the standard ITE trip-generation rates do not reflect variations in development density, land use mix, Site design, and the multi-modal transportation systems of large metropolitan areas, all of which are critical factors in travel demand. For these reasons, LADOT's Traffic Study Policies and Procedures allow projects to reduce their total trip generation to realistically account for pass-by trips, transit usage, walk-in patronage, as well as internal trip making opportunities. The trip-generation reductions taken for the Modified Project considered walkability, transit service, bicycle facilities, pass-by, and interaction between land uses, which are consistent with standard ITE and LADOT practices. The Modified Project represents an infill Project in a highly urbanized environment along two major arterials (Highland Avenue and Sunset Boulevard) and near existing transit; therefore, conservative reductions were applied to the restaurant and shopping center uses to account for transit/walk-in, pass-by and internal capture. The trip-generation assumptions were outlined in the Memorandum of Understanding (Appendix O of the Draft EIR), which was reviewed and approved by LADOT. The comment provides no evidence of how the credits are "over-valued" or affect the traffic analysis.

Comment: The Final EIR does not mention Project features that prevent the Project Applicant from leasing all 140,000 square feet of restaurant area to a High-Turnover Restaurant, thereby generating nearly 50 percent more traffic trips.

Response: As mentioned above, the commenter's use of the 140,000 square feet of restaurant space is incorrect. The specific restaurant tenants have not been determined at this time. As described in Trip Generation, 9th Edition, the quality and high-turnover restaurant land use categories are related. Therefore, the total restaurant floor area and potential locations throughout the Project Site were reviewed and compared to the food-related trip-generation land use descriptions and categories in the ITE Trip Generation manual in order to determine which locations will best fit which land use categories. As explained in the Traffic Study, it was assumed that approximately one-half of the restaurant locations will be high-turnover uses, which generate more trips, and one-half will be quality restaurant uses, which generate slightly fewer trips, to account for the potential range in restaurant and food and beverage uses that may occur through the Project. As stated above, the trip generation of the restaurant uses within the shopping center and hotel uses in the Original Project and Modified Project were accounted for separately. Therefore, the estimated trip-generation forecast provided in the supplemental traffic analysis is likely overstated. The comment provides no evidence of a 50 percent increase in traffic trips.

Comment: The 1.4 million sf Project will generate more direct vehicle trips than pass-by trips. More thorough traffic analysis is required for the Modified Project.

Response: The Traffic Memo does fully analyze and account for the Modified Project's net new trips to the area. As shown in the Table 5 of the Traffic Memo, it acknowledges that the majority of the Modified Project's trips are considered new trips to the Hollywood area, with the primary destination being the Project. However, the Modified Project will also generate pass-by trips, particularly given its mix of uses. The comment provides no evidence to the contrary.

The traffic analysis in the Traffic Memo is comprehensive of the issues presented by the Modified Project, is conservative, and is supported by substantial evidence. Therefore, no further analysis is required.

Comment: The new Subdivision Map is inappropriate. The Project no longer contains condominiums. Granting the tract map is inconsistent with ongoing plans for historic preservation of the Crossroads of the World Site, and the Hollywood Reporter.

Response: The comment cites no authority and identifies no valid basis for the statement that the Modified Project's proposed subdivision of five ground lots and 30 airspace lots is inappropriate. The California Subdivision Map Act is not limited to the consideration of condominiums and does not place any limit on the number of new legal lots that may be created by a new subdivision Project, and allows subdivisions to create air space lots without any limit on the number of such legal lots that may be created. See Govt. Code Secs. 66424, 66411.1; Civil Code Secs. 659 and 6542. The fact that the Modified Project only includes apartment dwelling units and no longer proposes individual condominium dwelling units does not prevent the creation of new air space units that separate residential, commercial, and parking uses, among other uses, within the Project Site. As such, the proposed subdivision of the Project Site into five ground lots and 30 airspace lots does not violate any provision of the Subdivision Map Act, which allows separate legal lots to be held in unified or separate ownership in any valid configuration set forth in an approved final tract map.

No support is provided for the comment's claim that the proposed subdivision of the Project Site conflicts with the "ongoing plans for the preservation of the Crossroads of the World Site and Hollywood Reporter Building." First, the Modified Project includes preservation of these two designated City Historic Cultural Monuments and the Bullinger Building. Second, the subdivision of the Project Site is merely a reconfiguration of legal lot lines; it does not have any impact on the physical environment and will not impact any historical resource on the Project Site. The comment provides no evidence to the contrary.

Comment: The findings for the discretionary approvals cannot be made, specifically that the Project conforms with the public necessity, convenience, general welfare and good zoning practice; that the Project will enhance the built environment in the surrounding neighborhood or perform a function/service that is essential or beneficial to the community, city or region; that the Project is compatible with and will not adversely affect or further degrade adjacent properties; and that the Project substantially conforms to the purpose, intent and provisions of the General Plan and applicable community or specific plans. The Project is not consistent with Policy 3.2.4.

Response: None of the listed findings identified in the comment is a required finding for the Vesting Tentative Tract Map (VTTM). The correct findings are found below under FINDINGS OF FACT (SUBDIVISION MAP ACT). The only finding indicated by the comment to be a VTTM finding is the first listed finding, where the comment states that the City was required to find that "the Project conforms with the public necessity, convenience, general welfare, and good zoning practice" to approve the VTTM. The comment also cites LAMC Section 17.15-C.2, which states that vested rights do not apply to conditions necessary to protect public health and safety or conditions that are required to comply with state or federal law. But neither that provision nor any other provision of Article 7 of the Municipal Code or the State Subdivision Map Act requires a "public necessity, convenience, general welfare, and good zoning practice" finding. The findings that are required, which are set forth in the Subdivision Map Act, Government Code Section 66474, can be found at pages 274 through 282 of the May 15, 2018, staff report, which are supported by substantial evidence in the record. The other findings identified in the comment relate to entitlements and approvals identified as being for approvals other than the VTTM, including, but not limited to, findings for General Plan Amendments, Zone Changes, and Conditional Use Permits. Regarding the first finding identified in the comment, the Project conforms by providing hotel, residential and commercial uses in the Hollywood Community Plan Area, near existing transit and neighborhoods and employment centers, and is allowable under the Project Site's current zoning. Regarding the second finding in the comment, the Project will enhance the built environment by rehabilitating historical resources and replacing underutilized buildings with new mixed-use buildings, including a hotel, market and restaurants, with a paseo and with ground floor retail to benefit the community, City and region. Regarding the third finding identified in the comment, the Project will be compatible with existing adjacent properties including the Hollywood and Highland Development, as well as the existing commercial development along Sunset Boulevard and Hollywood Boulevard. Finally, as described in further detail below under Finding "a" of the Subdivision Map Act, the Project is consistent with the Regional Center land use designation identified in the General Plan Framework, as well as the Hollywood Community Plan and the Hollywood Redevelopment Plan.

With regard to Policy 3.2.4 of the General Plan Framework, the Draft EIR concludes that the Project is consistent with this policy, which states: "provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhances the character of the commercial and industrial districts." Specifically, as stated on pages IV.H-35 and IV.H-36 of Section IV.H, Land Use, of the Draft EIR, "...the Project Site is currently designated as Regional Center Commercial in the Community Plan and zoned for commercial uses. The Project Site is surrounded by historic and modern low- to high-rise buildings occupied by neighborhood-serving commercial/retail uses, tourist and entertainment-related commercial/retail uses, offices, hotels, educational institutions, and multi-family residences. The Project will replace surface parking, existing one- and two-story office, commercial/retail, and residential buildings on the Project Site (that are not part of Crossroads of the World) with new structures to create an open-air mixed-use pedestrian district and enhance the character of the existing commercial district and major boulevards (e.g., Sunset Boulevard and Hollywood Boulevard) with a mix of shopping, dining, and entertainment uses, which will be consistent with adjacent land uses (e.g., other commercial, retail, residential, and entertainment uses)." Therefore, the Project is consistent with this land use policy. In addition, see below under Finding "a" of the Subdivision Map Act, for how the Project is consistent with the Regional Center land use designation identified in the General Plan Framework, as well as the Hollywood Community Plan and the Hollywood Redevelopment Plan.

Comment: The EIR leaves many potentially significant impacts unaddressed, including traffic impacts, air quality, greenhouse gas emissions, alcohol oversaturation, misidentified land use, questionable housing policies and other cumulative impacts. The Project is too big, too flawed and demands far too much from the citizens of Los Angeles.

Response: The comment concludes with general unsupported statements that the "EIR for the Project leaves many potentially significant impacts unaddressed" in multiple areas, and also expresses general opinions regarding the Modified Project. The Final EIR for the Project discloses significant and unavoidable impacts, summarized below in the section ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE. The comment does not provide evidence of any new impacts. For the reasons stated previously, the comments have not disclosed any errors or deficiencies in the Draft EIR or Final EIR requiring correction, revision or clarification.

2. Chatten Brown & Carstens LLP On Behalf of Livable LA

Comment: Because the proposed parking structure was not included in the Draft EIR, potential significant impacts on traffic, air quality and noise should be disclosed in a recirculated EIR.

Response: The potential impacts of the development of a parking structure on Development Parcel E are addressed in the EIR. The development of a parking structure within Development Parcel E is included as part of Alternative 3 in the Draft EIR and evaluated in the analysis provided beginning on page V-90 of Chapter V, Alternatives, of the Draft EIR. In addition, Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of the Final EIR provides a detailed discussion of the environmental effects of the Modified Project, including the development of the proposed parking structure within Development Parcel E. Specifically refer to the analyses at pages III 43 through III-91 of

Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of the Final EIR, which demonstrate that no new impacts or substantial increases in already identified impacts associated with traffic, air quality, noise, or other environmental issues will result from development of the parking structure within Development Parcel E, or any of the other modifications to the Original Project reflected in the Modified Project. In addition, as discussed in the Errata, the subterranean parking that was originally included in the Original Project under the Bullinger Building, Building C1 and the Early American Building has been eliminated by relocating parking to the new parking structure. Finally, the Project is meeting the parking requirements of the LAMC. Note that the provision of parking spaces is not an impact under CEQA pursuant to SB 743. The comment provides no evidence of impacts on traffic, air quality and noise.

Comment: The economic feasibility review does not support rejection of the Alternative 5 as infeasible.

Response: Please see detailed responses below.

Comment: Alternative 5 meets most of the Project Objectives. The impacts from Alternative 5 are ridiculous because the alternative could be conditioned not to create impacts. The FEIR states that noise and vibration will be greater to sensitive receptors that remain on-Site but the FEIR elsewhere states that impacts to on-Site receptors or users is not a factor in CEQA unless the Project exacerbates an existing condition.

Response: The Draft EIR and Final EIR both provide substantial evidence demonstrating that Alternative 5 will not fully meet the majority of the Project objectives. Refer to pages II-8 through II-11 of the Final EIR. The physical impacts of Alternative 5 that are evaluated in the Draft EIR and summarized in the Final EIR are accurate. Specifically, as noted on page V-266 of the Draft EIR, Alternative 5 will have greater impacts related to the following: a greater number of historical resources would be potentially impacted by underground excavation and construction in all four development parcels; surface water quality; and construction noise and vibration since this alternative would affect a greater number of sensitive receptors. Projects cannot be "conditioned" to avoid impacts; only mitigation can avoid or lessen impacts. The comment provides no evidence to the contrary. The commenter's reference to exacerbation relates to geology and soils impacts due to the Project's exacerbation of existing environmental conditions. Alternative 5's noise and vibration impacts are considered under CEQA because they will be impacts of Alternative 5 and are not existing conditions.

Comment: The Final EIR does not address the objections Caltrans raised regarding impacts to US 101.

Response: The Project's effects on US 101 were analyzed in the Traffic Study and reported in the Draft EIR in Section IV.L, Traffic, Access, and Parking. As reported in Table 24 of the Traffic Study, the analysis addresses eight freeway mainline segments; Caltrans intersections, including 18 freeway ramp locations; off-ramp queuing; on-ramp capacity; and freeway ramp sections. Caltrans facilities were evaluated in the Traffic Study according to the requirements of the First Amendment to the Agreement between LADOT and Caltrans District 7 on Freeway Impact Analysis Procedures (State of California and the City of Los Angeles, December 15, 2015). The analysis of Caltrans facilities was conducted based on methodology detailed in Caltrans' 2002 Guide for the

Preparation for Traffic Impact Studies, per the request made in Caltrans' November 23, 2015 NOP comment letter. Caltrans was included on the notification list for the Draft EIR and they have not provided further comment following inclusion of the analysis based on their comment letter.

Comment: Caltrans states that CMP methodology is not adequate for analyzing freeway impacts and therefore there is significant issue that has not been mitigated.

Response: The traffic analysis includes a required freeway impact analysis prepared in accordance with the State-mandated Congestion Management Program (CMP) administered by the Los Angeles County Metropolitan Transportation Authority (MTA). In addition to the CMP analysis, the Traffic Study also includes a screening analysis in accordance with the Caltrans Agreement with LADOT to determine if additional evaluation of freeway mainline and ramp segments was necessary beyond the CMP requirements. The screening analysis determined that the Project did exceed the screening criteria; therefore, further analyses of Caltrans facilities were conducted, and the results of that analysis are included in the Traffic Study and Draft EIR (pages IV.L-116 through IV.L-124 of Section IV.L, Traffic, Access, and Parking). As stated above, the analysis of Caltrans' facilities included freeway mainline segments, Caltrans' intersections, off-ramp queuing, on-ramp capacity, and freeway ramp sections and was conducted per Caltrans' 2002 Guide for the Preparation for Traffic Impact Studies, as requested by Caltrans in their November 23, 2015 public comment letter in response to the NOP, and was included in the EIR. Therefore, the Traffic Study did not rely solely on the CMP or screening criteria of the Caltrans Agreement, and the Project's potential impacts and effect on State facilities were fully disclosed in the Traffic Study and EIR. The comment provides no evidence to the contrary.

Comment: Caltrans requested a Traffic Mitigation Agreement, which is not included in Final EIR

Response: Caltrans has not adopted specific criteria by which to measure the significance of incremental impacts to the freeway mainline segments, identified required mitigation, or identified the nexus between mitigation and impacts. Therefore, it is impossible to identify whether a specific facility will be significantly affected since Caltrans has not adopted or implemented specific criteria. Similarly, the lack of a definitive threshold to determine whether a Project affects facilities results in the inability to identify mitigation measures that have a direct nexus to the potential impacts of a Project. Therefore, the EIR discloses, for informational purposes, future traffic conditions (without and with the Project) that represent cumulative conditions on the State facilities. Specifically, the Traffic Study concludes that the Project will contribute to the total projected growth on freeway mainline segments. The Project's proportionate share of the future traffic growth with regard to Caltrans freeway mainline segments was based on the methodology provided in Appendix B of Caltrans' 2002 Guide for the Preparation for Traffic Impact Studies and is reported in Table 36 of the Traffic Study. However, as stated in Appendix B of Caltrans' 2002 Guide for the Preparation for Traffic Impact Studies, the methodology is neither intended as, nor does it establish, a legal standard for determining equitable responsibility and cost of the Project's traffic impact. Moreover, Caltrans, through its comments on the EIR process, has not identified a specific improvement measure on the State facilities, or demonstrated that the improvement measure will reduce the impact to less-than-significant levels. Finally, Caltrans has no methodology to identify the need for

mitigation, threshold it relies on to identify the impacts for which it is requiring a Traffic Mitigation Agreement (TMA), or basis for finding that it is reasonably foreseeable that a TMA will reduce the identified significant impacts. In addition, Caltrans has no adopted or approved improvement plan that includes a specific improvement measure designed to reduce any impact created by the Project that is actually scheduled for construction, on which any money paid under any TMA will be spent. Furthermore, Caltrans does not have any mechanism to collect fees to ensure that impacts to Caltrans facilities are mitigated (see *Anderson First Coalition v. City of Anderson*). The Caltrans comment letter does not provide evidence or other technical analysis that demonstrates that the Project results in a significant cumulative impact requiring mitigation.

Comment: The City cannot adopt a statement of overriding considerations for cumulative impacts with feasible mitigation measures (i.e., TMA).

Response: As discussed above, the City has not been provided substantial evidence to support that a TMA is a legally defensible mitigation measure. As the Lead Agency, the City has the discretion to select the appropriate thresholds of significance and methodologies for the preparation of its EIRs. To consider the TMA as a mitigation measure, Caltrans will need to share the methodology it used to identify the impacts for which it is requiring the TMA, the basis for its finding that these are reasonable and foreseeable impacts from Project traffic, that the mitigation measure will reduce the identified significant impacts, provide the City the assurance that the fees and improvements will actually be implemented such that the lead agency can assert that the improvements will mitigate impacts, and provide substantial evidence to support all of the above. For a fee mitigation to be considered legal and effective mitigation for a cumulative impact, the fee must be legally enforceable and part of an adopted fee scheme that ensures funds will be available to pay for the facilities necessary to mitigate the impacts; in addition, the fee must fund an adopted improvement program which includes the improvements required by the mitigation measures to reduce the Project's impacts and which has actually scheduled the improvements to be built within a reasonable period of time. At the time the Draft EIR and Final EIR were released, Caltrans had not prepared the necessary fee study or adopted a fee program to make fees under a TMA legally enforceable. Therefore, without evidence that the TMA is part of a reasonable and legally enforceable plan for mitigation of the impacts, the City will not include the TMA for this EIR or impose related conditions on the Project. See *Tracy First v. City of Tracy* (2010) 177Cal.App.4th 912, 938-39. As such, the TMA is not a feasible mitigation measure and a statement of overriding considerations is appropriate and required by CEQA.

Comment: The size of the Project must be reduced to reduce impacts to Caltrans facilities.

Response: As noted above, with no adopted criteria to measure the significance of incremental impacts, no identified mitigation, and no established method to determine the nexus between mitigation and impacts, it is not possible to identify Project impacts, much less mitigation measures, including reduction in the size of a Project, which will be effective to lessen impacts on Caltrans facilities.

Comment: The Final EIR's attempt to take credit for energy reduction measures that must be implemented is misleading.

Response: As discussed the Final EIR, the EIR's analysis of the Project's GHG emissions complies with CEQA's requirements and recent case law, including the Supreme Court's guidance provided in *Center for Biological Diversity v. California Department of Fish and Wildlife* (Case No. 217763) (the "Newhall Ranch Case"). As discussed in both the Draft EIR and Final EIR, the City exercised its discretion to use the following threshold of significance to determine whether the Project will result in significant impacts associated with greenhouse gas emissions: whether the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB's Climate Change Scoping Plan, AB 900, SCAG's 2016–2040 RTP/SCS, and the City of Los Angeles LA Green Plan. Based on the detailed analysis in the Draft EIR, the City concluded that the Project complies with these plans and policies. In addition, through the purchase of emission offset credits, the Project will not result in any net greenhouse gas emissions in comparison to baseline conditions. As such, the Project's potential GHG emissions impacts are thoroughly and accurately analyzed in the Draft EIR. Contrary to this comment, there was no attempt to take credit for regulatory measures that are already in place. Specifically, the comparison with NIERM was used as just one way to demonstrate some of the emission reductions associated with the Project, such as exceeding Title 24 energy efficiency requirements, installation of photovoltaic (solar) panels on-Site, providing electric vehicle charging stations above and beyond code requirements, and prohibition of fireplaces. Finally, since impacts associated with GHG emissions will be less than significant and the Project's emissions will be offset, there is no basis to require a reduction in the size of the Project. The comment provides no evidence to the contrary. Note: as mentioned above in Environmental Documentation Background, the State approved the Project as an ELDP project and therefore the Project must meet certain criteria to qualify, as listed on the Office of Planning and Research website. As found in the certification documentation for the Project, the Project includes the purchase of carbon offset credits, which were approved by CARB. This is only one component of the Project, which reduces the Project's greenhouse gas emissions.

Comment: The proposed Hollywood Center (Millennium) Project application reveals cumulative impacts that must be analyzed in the EIR.

Response: The Millennium Hollywood Mixed-Use Project is included as Related Project No. 47 in the Draft EIR and is appropriately accounted for in the cumulative impact analyses throughout the Draft EIR, including the traffic analysis. The comment provides no evidence to the contrary.

Comment: The EIR sweeps liquefaction issues under the rug by stating that the General Plan Safety Element's classification of the Project Site as susceptible to liquefaction is outdated.

Response: The analysis of liquefaction is based on a detailed geotechnical analysis that is based on the latest regulations and methodologies for addressing liquefaction. The discussion on Page II-20 of Section II, Responses to Comments, of the Final EIR is correct. Though the 1996 Safety Element classifies the Project Site as part of an area that could be susceptible to liquefaction, this information is outdated based on more recent surveys and analyses. The most recent and authoritative State Seismic Hazard Zones Map, which is determinative as to whether a Site in the Hollywood area is susceptible to liquefaction, confirms that the Project Site is not located in an area

classified as a Liquefaction Hazard Zone. Furthermore, the Grading Division of the Department of Building and Safety (DBS) has reviewed the geotech report prepared for the Project and has confirmed that the Project Site is located outside a State of California liquefaction, earthquake induced landslide, or fault rupture hazard zone (see reference in Final EIR, email from Casey Jensen dated April 23, 2018). DBS also determined that the Project does not require any grading or construction of an engineered retaining structure to remove potential geologic hazards. The comment provides no evidence to the contrary.

Comment: The Draft EIR did not identify significant impacts on LAUSD schools.

Response: The comment is incorrect. The EIR provides a thorough analysis of potential impacts to LAUSD schools, including impacts related to air quality, noise, traffic, and pedestrian safety. Refer to Sections IV.B, Air Quality; IV.I, Noise; and IV.L, Traffic, Access, and Parking, of the Draft EIR. With implementation of the identified mitigation measures, no significant impacts to LAUSD facilities will occur. The comment paraphrases only a part of the LAUSD comment. The full statement made by LAUSD is: "Based upon a review of the Draft EIR, the proposed Project will have a significant impact on LAUSD schools, therefore LAUSD will like the City to consider the following additional mitigation measures which were not incorporated into the Draft EIR." Contrary to LAUSD's statement, the Draft EIR provided substantial evidence of and disclosed all potential impacts to schools. In response to LAUSD's comment, there were revisions to existing mitigation measures from the Draft EIR to address LAUSD concerns and ensure that impacts will be less than significant, as the Draft EIR concluded. Specifically, see TRA-PDF-1 in the Final EIR. The comment provides no evidence to the contrary.

Comment: The FEIR improperly refused to adopt additional mitigation measures recommended by SCAQMD.

Response: The Final EIR clarifies that CEQA does not require all feasible measures to "go beyond what is required by law" to minimize significant impacts. The Final EIR provides a detailed response to SCAQMD's comments, including the suggested mitigation measures, beginning on page II-89. The following mitigation measures in the Final EIR integrate SCAQMD's recommendations: AIR-MM-5; AIR-MM-6. SCAQMD was included on the distribution notification list for public agencies for the Draft EIR and no further comments were received.

Comment: Floor area averaging is not allowed for the Project unless findings and other required procedures are met.

Response: The comment sets forth the requirements for FAR Averaging under LAMC Section 12.24-W,19, but is not about the content of the Final EIR. The Project is no longer requesting FAR Averaging pursuant to LAMC Section 12.24-W,19. Instead, as part of a Density Bonus Compliance Review, the Project is requesting an On-Menu Incentive to average floor area, density, open space, and parking over the Project Site and to permit vehicular access from a less-restrictive zone to a more-restrictive zone, per LAMC 12.22-A,25. This incentive is allowed if the Project is providing 11 percent Restricted Affordable Units for Very Low Income households and the proposed use is permitted by the underlying zone of each parcel. The Project meets these criteria and, therefore, is eligible for the averaging per LAMC Section 12.22-A,25. Note that the findings under 12.24 are different than the those under 12.22-A,25, as detailed in the LAMC. The requested

Density Bonus Compliance Review and associated incentives shall be considered by the City's decision-makers.

3. AHF Comments

AHF submitted a letter with comments contesting the financial feasibility review of Alternative 5. Please see detailed response below.

4. Public Comments at May 15, 2018 Hearing

Comment: The EIR fails to analyze potential indirect displacement caused by Project.

Response: The comment does not explain what "indirect displacement" refers to. The State CEQA Appendix G addresses displacement of substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, and displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere. As discussed in Sections IV.J.1 through IV.J.3 of the Draft EIR, the Project's impacts associated with a net increase in housing, population, and employment will be less than significant. As discussed in the Draft EIR and in Topical Response No. 3 of the Final EIR, the Project Site contains a total of 82 existing residential units, all of which will be demolished and are subject to the City's Rent Stabilization Ordinance (RSO), which requires a one-to-one replacement of those units. In excess of the RSO requirements to provide 82 affordable units, the Project will provide 105 affordable units for Very Low Income Households.

Comment: CRA has not approved a "transportation plan."

Response: As discussed in detail in Topical Response No. 7 of the Final EIR, just after ABX1 26 became effective, CRA/LA divested itself of all discretionary land use approvals. Specifically, on June 21, 2012, the CRA/LA Governing Board approved a resolution that "clarifies that future CRA/LA review of development projects shall not require discretionary land use approvals..." within certain Project areas, including Hollywood. Pursuant to the Board's Resolution, all land use regulations under the Hollywood Redevelopment Plan "defers to and are superseded by the applicable City of Los Angeles General Plan, Community Plan and Zoning Ordinance land use designations and regulations." Since that time and consistent with CRA/LA's Resolution, the City—not CRA/LA—determines a Project's conformance with the applicable plans. Finally, the Hollywood Redevelopment Plan does not require approval of the transportation plan but merely preparation of one for consideration by the CRA board.

Comment: DEIR did not consider potential impacts of Project to children, using the recent children's health study from USC/UCLA.

Response: It is unclear what specific study the comment references, as it was not included. Nonetheless, the EIR fully evaluated potential air quality and health risk impacts, and included an evaluation of potential impacts to schools in the Project vicinity. Refer to Section IV.B. Air Quality of the Draft EIR and Response to Comment No. 27-18 of the Final EIR, which demonstrate that impacts to children will be less than significant.

Comment: The Project buildings cannot be anchored on bedrock so they are subject to liquefaction during an earthquake.

Response: As discussed in detail in Section IV.E. Geology and Soils of the Draft EIR and within Topical Response No 2 of the Final EIR, based on the most recent mapping by the CGS, concurrence with the Department of Building and Safety Grading Division, and the detailed Geotechnical Report included as Appendix F of the Draft EIR, the Project Site is not located within a designated Liquefaction Hazard Zone. In addition, the Project will comply with all applicable seismic safety requirements. The public testimony did not provide any evidence that that the building cannot be anchored on bedrock.

Comment: The Draft EIR did not adequately analyze or mitigate construction impacts on neighboring businesses.

Response: Each section of the Draft EIR fully evaluates the potential construction-related impacts from the Project on the environment, including adjacent properties, and includes mitigation measures to reduce construction-related impacts where appropriate. For example, refer to Sections IV.B. Air Quality, IV.I. Noise, and IV.L. Traffic, Access and Parking for detailed analyses associated with potential construction impacts.

Comment: The modifications to Project require recirculation (e.g. inclusion of parcel for parking garage; decision to not reconfigure Las Palmas, etc.).

Response: The environmental effects associated with the Modified Project, including the development of a parking structure in Parcel E and retention of the alignment of Las Palmas, have been fully disclosed and analyzed in the EIR. The development of a parking structure within Development Parcel E is included as part of Alternative 3 in the Draft EIR and evaluated in the analysis provided in Chapter V, Alternatives, of the Draft EIR. In addition, Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of the Final EIR provides a detailed discussion of the environmental effects of the Modified Project, including the development of the proposed parking structure within Development Parcel E. Specifically refer to the analyses at pages III 43 through III-91 of Section III, Revisions, Clarifications, and Corrections to the Draft EIR, of the Final EIR, which demonstrate that no new impacts or substantial increases in already identified impacts associated with traffic, air quality, noise, or other environmental issues will result from development of the parking structure within Development Parcel E, or any of the other modifications to the Original Project reflected in the Modified Project.

Comment: The EIR fails to analyze traffic impacts on Highland Avenue.

Response: Section IV.L. Traffic, Access and Parking provides a comprehensive analysis of potential traffic impacts. In particular, 17 study intersections at Highland Avenue have been evaluated.

Comment: The impacts on public services, specifically LAPD, are not analyzed.

Response: Impacts to public services including police protection are fully evaluated in the Draft EIR. Refer to Sections IV.K.1 Police Protection, IV.K.2 Fire Protection, IV.K.3 Schools, IV.K.4 Libraries and IV.K.5 Parks and Recreation. These analyses were completed in consultation with the public service providers, including LAPD.

Comment: Not all mitigation measures to address noise, traffic, and pedestrian safety on LAUSD were adopted.

Response: The Project has incorporated the feasible measures recommended by LAUSD. Refer to Section III. Revisions, Clarifications, and Corrections to the Draft EIR for the modifications to the Project Design Features in response to LAUSD's comments on the Draft EIR.

Draft EIR Availability

Pursuant to the requirements of CEQA Sections 21186 and 21081.6(a)(2), the documents and other materials that constitute the record of proceedings, including, without limitation, those on which the City's CEQA findings are based, are posted on the Department of City Planning's website at <http://planning.lacity.org> (click on the "Environmental Review" tab on the left-hand side, then "Final EIR," and click on the Project title), and are also located at the Department of City Planning, 221 North Figueroa St., Suite 1350, Los Angeles, California 90012. Copies of the Final EIR are also available at the following Library Branches:

- 1) Los Angeles Central Library—630 West Fifth Street, Los Angeles, CA 90071
- 2) Francis Howard Goldwyn Hollywood Regional Library—1623 N. Ivar Ave., Los Angeles, CA 90028
- 3) Will & Ariel Durant Branch Library—7140 Sunset Blvd., Los Angeles, CA 90046
- 4) John C. Fremont Branch Library—6121 Melrose Ave., Los Angeles, CA 90038

III. FINDINGS REQUIRED TO BE MADE BY LEAD AGENCY UNDER CEQA

Section 21081 of the California Public Resources Code and Section 15091 of the State CEQA Guidelines (the "Guidelines") require a public agency, prior to approving a Project, to identify significant impacts and make one or more of three possible findings for each of the significant impacts.

- A. The first possible finding is that "[c]hanges or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (PRC, section 21081(a)(1)); and
- B. The second possible finding is that "[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (PRC, section 21081(a)(2)); and
- C. The third possible finding is that "[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible, the mitigation measures or Project alternatives identified in the final EIR." (PRC, section 21081(a)(3)).

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final EIR for the Project as fully set forth therein. Section 15091 of the CEQA Guidelines requires the findings to address the environmental impacts that an EIR identifies to be "significant." For each of the significant impacts associated with the Project, either before or after mitigation, the following sections are provided:

1. Description of Significant Effects – A specific description of the environmental effects identified in the EIR, including a judgment regarding the significance of the impact;
2. Project Design Features – Reference to the identified Project Design Features that are a part of the Project (the numbering of these features corresponds to the numbering in the Draft EIR);
3. Mitigation Measures – Reference to the identified mitigation measures or actions that are required as part of the Project (the numbering of these mitigation measures corresponds to numbering in the Mitigation Monitoring Program, which is included as Section IV of the Final EIR);
4. Finding – One or more of the three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091;
5. Rationale for Finding – A summary of the reasons for the finding(s);
6. Reference – A notation on the specific section in the Draft EIR which includes the evidence and discussion of the identified impact.

V. ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT OR LESS THAN SIGNIFICANT IN THE INITIAL STUDY

The City Planning Department prepared an Initial Study dated March 6, 2014. The Initial Study is located in Appendix A of the Draft EIR. The Initial Study found the following environmental impacts not to be significant or less than significant. These determinations are also summarized in Section VI, Other CEQA Considerations of the Draft EIR:

- A. Agricultural and Forest Resources**
 1. Farmland
 2. Existing Zoning for Agricultural Use or Williamson Act Contract
 3. Forest Land or Timberland Zoning
 4. Loss or Conversion of Forest Land
 5. Cumulative Impacts
- B. Air Quality**
 1. Objectionable Odors
- C. Biological Resources**
 1. Sensitive Biological Species
 2. Riparian Habitat and Wetlands
 3. Movement of any Resident or Migratory Species
 4. Local Policies and Ordinances

5. Habitat Conservation Plans
- E. Geological Resources**
 1. Landslides
 2. Soil Support for Septic Tanks
- F. Hazards and Hazardous Materials**
 1. Airport Land Use Plans
 2. Private Airstrips
 3. Wildland Fires
- G. Hydrology and Water Quality**
 1. 100-Year Flood Hazard Areas, 100-year Flood and Flooding
 2. Seiche, Tsunami or Mudflow
- H. Land Use and Planning**
 1. Habitat or Natural Community Conservation Plans
- I. Mineral Resources**
 1. Loss of Availability of Known Mineral Resources
 2. Loss of Mineral Resources Recovery Site
 3. Cumulative Impacts
- J. Noise**
 1. Airport Land Use Plans
 2. Private Airstrips
- K. Transportation/Circulation**
 1. Air Traffic Patterns

VI. ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT PRIOR TO MITIGATION

The following impact areas were determined to be less than significant, and based on that analysis and other evidence in the administrative record relating to the Project, the City finds and determines that the following environmental impact categories do not result in any significant impacts and that no mitigation measures are needed:

A. Aesthetics

Enacted in 2013, SB 743 adds CEQA (Pub. Res. 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." As set forth in Section IV.A.2, Light, Glare, and Shading, of the Draft EIR, the Project is a mixed-use development and is located less than 0.5 mile from several bus lines and a rail line, the majority of which provide a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Therefore, the Project is located in a transit priority area as defined in CEQA Section 21099. In addition, the City's Zone Information and Map Access System

(ZIMAS) confirms the Project Site's location within a transit priority area, as defined in the City's Zoning Information File No. 2452. CEQA Appendix G, which includes a comprehensive list of environmental topics under CEQA, does not expressly list shade and shadow impacts. The Los Angeles CEQA Thresholds Guide, however, considers shade and shadow impacts to be a type of aesthetic visual character impact under question 1c of Appendix G. The City has issued Zoning Information File (ZI) No. 2452, confirming that SB 743 applies to a Project's aesthetic impacts, including shade and shadow impacts. As such, the Project has no aesthetic impacts pursuant to PRC, section 21099(d).

B. Air Quality

1. Consistency with Applicable Air Quality Management Plan

The SCAQMD's 2012 Air Quality Management Plan ("AQMP") contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the National Ambient Air Quality Standards. As set forth in Section IV.B of the Draft EIR, the Project is consistent with SCAQMD rules and regulations and SCAG policies, including with the AQMP, and the City's General Plan Air Quality Element. Therefore, impacts are less than significant.

2. Localized Impacts from Construction Activities

As presented in Section IV.B, Air Quality, of the Draft EIR, a conservative estimate of the Project's maximum localized construction emissions for off-Site sensitive receptors does not exceed the localized screening thresholds for CO, NO_x, PM₁₀, and PM_{2.5}. Therefore, impacts are less than significant.

3. Construction Odors

As a result of the Project's mandatory compliance with applicable SCAQMD rules and regulations, Project construction activities and materials result in less-than-significant impacts with regard to odors.

4. Construction Toxic Air Contaminants (TACs)

The greatest potential for TAC emissions during construction comes from diesel particulate matter emissions associated with heavy-duty equipment during demolition, excavation and grading activities. Potential TAC impacts during proposed construction activities were evaluated by identifying potential sources of TAC emissions. Page IV.B-35 of the Draft EIR identified the greatest potential for TAC emissions during construction are from diesel particulate (DPM) emissions associated with heavy equipment operations. DPM has no acute exposure factors and, therefore, the discussion appropriately focused on long-term exposure that could lead to carcinogenic risk. The SCAQMD Handbook does not recommend analysis of TACs from short-term construction activities. The rationale for not requiring a health risk assessment for construction activities is the limited duration of exposure. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. Specifically, "Individual Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs over a 70-year lifetime will contract cancer based on the use

of standard risk assessment methodology. Given the short-term construction schedule of approximately 30 months, the Project does not result in a long-term (i.e., 70-year) source of TAC emissions, as disclosed on pages IV.B-35 and IV.B-36 of the Draft EIR. No residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period (48 out of 840 months of a 70-year lifetime), TAC emissions result in a less-than-significant impact.

5. Localized Operational Impacts

As shown in Tables IV.B-8 and IV.B-9 in Section IV.B, Air Quality, localized impacts from on-site operational emissions do not exceed any of the applicable SCAQMD localized significance thresholds (LSTs). Therefore, impacts are less than significant.

6. Operational TACs

The Project does not include sources of acutely and chronically hazardous TACs such as those that are typically used in industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). In addition, no such acutely and chronically hazardous materials are currently used within the Project Site. As such, the Project does not release substantial amounts of TACs that result in significant impacts on human health. Impacts are less than significant.

7. Operational Odors

The Project does not include any uses identified by the SCAQMD as being associated with odors. The Project's garbage collection areas are covered, and the Project implements good housekeeping practices to prevent objectionable odors from garbage collection areas. Therefore, potential odor impacts are less than significant.

8. Cumulative Impacts

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for Project-specific impacts cause a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in non-attainment. Construction of the Project has less-than-significant impacts with regard to localized emissions and TAC emissions. Therefore, the Project's contributions to cumulative localized emissions and cumulative TAC emissions are less than significant.

According to the SCAQMD, if an individual Project results in air emissions of criteria pollutants that exceed the SCAQMD's recommended daily thresholds for Project-specific impacts, then the Project results in a cumulatively considerable net increase of these criteria pollutants. Operation of the Project has less-than-significant impacts with regard to localized emissions and TAC emissions. Therefore, the Project's contributions to cumulative localized emissions and cumulative TAC emissions are less than significant.

C. Greenhouse Gas Emissions

1. Construction and Operational Impacts: The Project generates GHG emissions. However, even a very large individual Project does not generate enough GHG emissions on its own to significantly influence global climate change, and, it is for this reason that GHG emission impacts are generally treated as cumulative impacts. Moreover, as set

forth in Section IV.C of the Draft EIR, with implementation of the applicable Project Design Features identified throughout this Draft EIR, including GHG-PDF-1 through GHG-PDF-8 and the requirements set forth in the City of Los Angeles Green Building Code and the full implementation of current state mandates, the Project's GHG emissions are approximately 315 metric tons of equivalent mass of CO₂ (MTCO_{2e}) per year during construction and 18,051 MTCO_{2e} per year during operation, for a combined total of 18,365 MTCO_{2e} per year. The Project's GHG emissions represent an approximate 38-percent reduction from the GHG emissions from the "no implementation of emission reduction measures" (NIERM) scenario, which is more commonly known as the "business-as-usual" or BAU scenario; this comparison is not used as a threshold of significance, but rather as a way to demonstrate the efficacy of the GHG reduction programs and measures applicable to or incorporated into the Project. In addition, the Project is designed in accordance with the regulatory requirements and includes Project Design Features that are consistent with the applicable City of Los Angeles goals provided in the Air Quality Element of the City of Los Angeles General Plan.

Moreover, the Project is consistent with the regulations outlined in the AB 32 *Climate Change 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 *Climate Change Scoping Plan*, the Project uses "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure are designed to achieve the standards of the Silver Rating under LEED®. Similarly, the Project is consistent with the regulations and reduction actions/strategies outlined in SCAG's Regional Transportation Plan/Sustainable Communities Strategy and the City of Los Angeles' LA Green Plan. More specifically, as part of SCAG's 2016–2040 RTP/SCS, a reduction in VMT within the region is a key component to achieving the 2020 and 2035 GHG emission reduction targets established by CARB. The Project results in a VMT reduction of approximately 45 percent in comparison to NIERM and is consistent with SCAG's 2016–2040 RTP/SCS. The Project also complies with the LA Green Plan, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's compliance with regulatory measures and implementation of Project Design Features identified throughout the Draft EIR advances these objectives.

With regard to AB 900, the Project does not result in any net additional GHGs, including GHG emissions from employee transportation in accordance with PRC Section 21183(c) with the purchase of emission offset credits. Accordingly, the Project meets the GHG emissions requirements for streamlined environmental review under CEQA. In summary, the Project does not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, and Project-specific impacts with regard to climate change are less than significant.

2. Cumulative Impacts: Although the Project is expected to emit GHGs, the emission of GHGs by a single Project into the atmosphere is not itself necessarily 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 resultant consequences of that climate change can cause adverse environmental effects. A Project's GHG emissions typically are very small in comparison to state or

global GHG emissions and, consequently, in isolation, they 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 are 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. Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the Project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific Project represents new emissions or existing, displaced emissions. 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 is less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions: CARB's *Climate Change Scoping Plan*, AB 900, SCAG's RTP/SCS, and the LA Green Plan.

The Project is consistent with the applicable GHG reduction plans and policies. The NIERM comparison and SCAQMD's draft service population target demonstrate 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 if California's direct regulatory measures reduce GHG emissions less than expected. The Cap-and-Trade Program will ensure that the GHG reduction targets of AB 32 are met. Thus, given the Project's consistency with state, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project will not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable.

Project Design Features

The City finds that Project Design Features GHG-PDF-1, GHG-PDF-2, GHG-PDF-3, GHG-PDF-4, GHG-PDF-5, GHG-PDF-6, GHG-PDF-7 and GHG-PDF-8, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, reduce the potential greenhouse gas emissions of the Project. These Project Design Features were taken into account in the analysis of potential impacts.

D. Cultural Resources

Potential Impacts to Archeological Resources

As the archaeological records search indicated, the Project Site contains no identified archaeological sites, and three archaeological sites are located within a 0.5-mile radius of the Project Site. The Project Site contains no isolates or within a 0.5-mile radius of the it. In addition, the Project Site has not been surveyed for the presence of archaeological resources. While this does not preclude the potential for an archaeological Site to be

identified during construction activities associated with the Project, it is unlikely to occur since the Project Site has previously experienced ground surface disturbance. The maximum depth of excavation for Project development is approximately 75 feet below the existing ground surface. If an archaeological resource were to be discovered during construction of the Project, work in the area will cease, and deposits will be treated in accordance with applicable regulatory requirements, including those set forth in Public Resources Code Section 21083.2 with respect to any unique archaeological resource. In addition, if human remains are discovered during construction of the Project, work in the immediate vicinity will be halted, the County Coroner, construction manager, and other entities will be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods will occur in accordance with Public Resources Code Sections 5097.91 and 5097.98, as amended. With the implementation of all applicable regulatory requirements, the Project's impacts related to archaeological resources are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on historical resources.

Potential impacts to Tribal Cultural Resources

On January 4, 2016, the City of Los Angeles Department of City Planning (DCP), as lead agency for the Project, notified seven California Native American tribes pursuant to AB 52, including the following:

- Fernandefio Tataviam Band of Mission Indians
- Gabrieleño Band of Mission Indians—Kizh Nation
- Gabrielino/Tongva Nation
- Gabrielino/Tongva San Gabriel Band of Mission Indians
- Gabrielino-Tongva Tribe
- San Fernando Band of Mission Indians
- Soboba Band of Luiseño Indians

Two tribes—the Fernandefio Tataviam Band of Mission Indians (Tataviam) and the Soboba Band of Luiseño Indians—responded to DCP's notification. The Tataviam requested consultation with DCP. This consultation involved written communication, telephone communication, and e-mail correspondences, as documented in Appendix E of the Draft EIR. DCP also coordinated with Dudek, a cultural resources consultant, in reviewing all the materials and articles submitted by the Tataviam during consultation (as included in Appendix E.5 of the Draft EIR). The results of this review is also included in Appendix E.6 of the Draft EIR. At the conclusion of consultation, the Tataviam and DCP determined that there are no tribal cultural resources on the Project Site or in the immediate vicinity (i.e., within 0.5 mile).

The Soboba Band of Luiseño Indians also submitted a letter on November 20, 2015, stating that the tribe did not have any specific concerns regarding known cultural resources in the area and deferred to the Gabrieleño Tribal Consultants, who are closer to the Project Site area. However, pursuant to AB 52, there is no authority to defer a tribe's authority to a third party, and, notwithstanding, the Gabrieleño Tribal Consultants did not submit any evidence into the record of tribal cultural resources at the Project Site.

In addition, the cultural/archaeological resources records search was conducted by the SCCIC at California State University, Fullerton. It included a review of all recorded archaeological and built-environment resources, as well as a review of cultural resource reports on file. The SCCIC also reviewed the California Points of Historical Interest (SPHI), the California Historical Landmarks, the California Register, the National Register, the California State Historic Properties Directory, and the City of Los Angeles Historic-Cultural Monuments listings. As explained in the Draft EIR, tribal cultural resources include, but are not limited to, cultural resources included or determined to be eligible for inclusion in the California Register or those included in a local register of historical resources. Based on the SCCIC's review of the California Register, the National Register, and the City of Los Angeles Historic-Cultural Monuments, the SCCIC did not identify any previously recorded archeological resources, including recorded tribal cultural resources within the Project Site. A records search of the NAHC Sacred Lands File was also completed for the Project Site area in September 2016. The results of the records search did not identify any previously recorded sacred lands within the Project Site or its vicinity.

Accordingly, the results of the records searches (i.e., SCCIC and NAHC Sacred Lands File) conducted for the Project Site and the aforementioned independent analysis of correspondence and materials relative to potential tribal cultural resources on the Project Site by Dudek demonstrate that there is no record or evidence of tribal cultural resources on or near the Project Site. In addition, at the conclusion of the tribal consultation conducted under AB 52, DCP and the Tataviam mutually agreed that the Project does not significantly impact a tribal cultural resource (see Appendix E.7 of the Draft EIR). As such, impacts related to tribal cultural resources are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on tribal cultural resources.

Potential Cumulative Impacts to Archeological and Paleontological Resources

The Project Site vicinity is located within an urbanized area that has been substantially disturbed and developed over time, a condition that renders it less likely that archeological or paleontological resources will be encountered. If archaeological resources are uncovered, each related Project will be required to comply with applicable regulatory requirements, such as CEQA Guidelines Section 15064.5, Public Resources Code Section 21083.2, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.9. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures will be established as necessary to address the potential for uncovering paleontological resources. Therefore, the Project's impacts to archaeological and paleontological resources are not cumulatively considerable, and cumulative impacts are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on historical resources.

Potential Cumulative Impacts to Tribal Cultural Resources

The Project Site vicinity is located within an urbanized area that has been substantially disturbed and developed over time, a condition that renders it less likely that tribal cultural resources will be encountered. If tribal cultural resources are uncovered, each of the related projects will be expected to comply with regulatory requirements, including required consultation with the California Native American Tribes. Therefore, the Project's impacts to tribal cultural resources are not cumulatively considerable, and cumulative impacts are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on historical resources.

E. Geology and Soils

In 2015, the California Supreme Court, in *California Building Industry Association (CBIA) v. Bay Area Air Quality Management District (BAAQMD)*, 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. Specifically, the decision held that an impact from the existing environment on the Project, including its 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 impact must be assessed, including how it might affect future users and/or residents of the Project.

1. Construction

Construction activities consist of the demolition of the existing surface parking lots and building structures, except for those located in Crossroads of the World, followed by grading and excavation for the subterranean parking garages. Building foundations will then be placed, followed by building construction and the installation of utilities, paving, concrete, and landscape. The maximum depth of excavation reaches to 78 feet below grade surface. All existing certified fill will be removed during grading and excavation. As such, Project construction is typical of construction in urban environments and does not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions or stresses in the earth's crust. Furthermore, there are no active or potentially active faults that underlie the Project Site. Accordingly, construction of the Project will not exacerbate seismic conditions or other geologic conditions on the Project Site or in the vicinity, and, as such, construction impacts related to surface ground rupture, strong seismic ground shaking, liquefaction, and seismically induced settlement are less than significant. In addition, the Project construction will not cause, accelerate, or exacerbate in whole or in part geologic hazards, including instability from erosion, that result in substantial damage to structures, infrastructure, or other properties or expose people to substantial risk of injury.

2. Seismic Hazards

(a) Ground Surface Rupture

No known active or potentially active faults underlie the Project Site, and, according to the California Geological Survey (CGS) Earthquake Fault Zone map for the Hollywood 7.5-minute Quadrangle, which was released in 2014, the Project Site is not located within a state-designated Alquist-Priolo earthquake fault zone or Seismic Hazard Zone. The nearest fault to the Project Site is the Hollywood Fault, located approximately 1,500 feet (0.3 mile) to the north. Therefore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site, and the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Thus, the Project does not exacerbate existing environmental conditions. Therefore, impacts associated with surface rupture from a known earthquake fault are less than significant, and no mitigation measures are required.

(b) Strong Seismic Ground Shaking

The Project Site is located within the seismically active region of Southern California and will potentially be subject to strong ground motion if a moderate to strong earthquake occurs on a local or regional fault. These seismic ground shaking effects at the Project Site will not be exacerbated by the Project because the Project will not involve mining operations, deep excavation into the earth, or boring of large areas creating unstable seismic conditions that will exacerbate ground shaking. Furthermore, no active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, impacts associated with seismic ground shaking are less than significant, and no mitigation measures are required.

Moreover, engineering design solutions reduce the substantial risk of exposing people or structures to loss or injury. State and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, the substantial risk that buildings will collapse is reduced. The Geotechnical Report contains preliminary recommendations for the type of engineering practices that will be used. Additionally, a final design-level geotechnical report will be prepared by the Project Applicant and reviewed to the satisfaction of the Department of Building and Safety before the issuance of grading permits. The final recommendations from that report will be enforced for the construction of the Project. Based on the Geotechnical Report, the Project Site is suitable for development, and the Project may be constructed using standard, accepted, and proven engineering practices considering the seismic shaking potential and geologic conditions at the Project Site. As with other development projects in the Southern California region, the Project will comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the 2013 California Building Code with City amendments. The 2013 California Building Code incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code. The Project will also comply with the plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, Site-specific geotechnical report. In addition, the

state and City mandate compliance with numerous rules related to seismic safety, including the Alquist-Priolo Earthquake Fault Zoning Act, Seismic Safety Act, Seismic Hazards Mapping Act, the General Plan Safety Element, and the Los Angeles Building Code. Pursuant to those laws, the Project Site must demonstrate compliance with the applicable provisions of these safety requirements before permits can be issued for construction of the Project.

(c) Liquefaction

The City's Zoning Information and Map Access System indicates that the Project Site is not located in an area that has been identified by the State of California as being potentially susceptible to liquefaction. Furthermore, the Project Site is not located within a state-designated seismic hazard zone for liquefaction potential or within a City of Los Angeles Liquefaction Hazard Zone. Typically, liquefaction occurs in shallow groundwater areas where there are loose, cohesionless, fine grained soils. The historic high groundwater level in the Project Site area is approximately 70 to 80 feet below ground surface and groundwater was not encountered at the maximum depth of 70.5 feet during field exploration, according to the Geotechnical Report included in Appendix F of the Draft EIR. Furthermore, the Project Site is mostly underlain by very stiff to hard clay. Due to the depth of the historical highest groundwater level, the type of soils underlying the Project Site, and the liquefaction mapping by the CGS, the Project Site will not be capable of liquefaction during an earthquake event. Therefore, based on these considerations, the Project Site does not exacerbate existing environmental conditions or cause or accelerate geologic hazards related to liquefaction, which will result in substantial damage to structures or infrastructure, nor does it bring people into areas that are susceptible to substantial risk of injury. As such, impacts associated with liquefaction are less than significant, and no mitigation measures are required.

(d) Seismically Induced Settlement

The Project Site is underlain with uncertified fill consisting of silty sand. The uncertified fill is underlain by clay with sand and sandy clay, interbedded with medium dense silty sand. Although, based on the Geotechnical Report, seismically induced settlement of silty sand layers located above the water table could have occurred on the Project Site, these settlements are estimated to be on the order of 0.5 inch and have been taken into account in the structural design of the Project. In addition, the Project will comply with the Site plan review and permitting requirements of the Los Angeles Department of Building and Safety, including the recommendations provided in a final, Site-specific geotechnical report subject to review and approval by the Los Angeles Department of Building and Safety. Through compliance with regulatory requirements and Site-specific geotechnical recommendations, the Project does not exacerbate and cause or accelerate geologic hazards related to seismically induced settlement.

3. Sedimentation and Erosion

Project-related construction activities will comply with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, Project construction will comply with the Los Angeles Building Code, which requires necessary permits, plans, plan checks, and inspections to ensure that the Project reduces its sedimentation and erosion effects. In addition, the

Project is required to have an erosion control plan approved by the LADBS, as well as a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the NPDES permit requirements. As part of the SWPPP, Best Management Practices (BMPs) are implemented during construction to reduce sedimentation and erosion levels to the maximum extent possible. In addition, Project construction contractors are required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. With regulatory compliance and the implementation of BMPs, impacts from soil erosion are less than significant, and no mitigation measures are required.

4. Soil Stability

According to the Geotechnical Report, the Project Site is underlain with uncertified fill and underlain by clay with sand and sandy clay, interbedded with medium dense silty sand. The existing fill was encountered on the Project Site ranging from one to seven feet below existing grade. The anticipated depth of excavation for Project development is approximately 36 to 78 feet below ground surface for the construction of the proposed subterranean garages. Based on the Geotechnical Report, the existing fill is considered to be uncertified and should not be used for support of new structures or pavement and will be removed during excavation of the basement levels and replaced with new compacted fill. Construction debris from previous Site development was also encountered in the existing fill. Thus, all excavated soil will be exported off-Site to the nearest landfill for proper disposal and recycling.

All required excavations will be sloped, or properly shored, in accordance with the provisions of the California Building Code and additional Los Angeles Building Code requirements, as applicable. All Project construction activities will adhere to the requirements of the Los Angeles Municipal Code and the California Building Code. The Project Applicant is also required to prepare and implement a final, Site-specific geotechnical report and incorporate the recommendations contained in the Geotechnical Report in the Project design. Therefore, through compliance with regulatory requirements and Site-specific geotechnical recommendations, impacts related to soil stability are not being exacerbated by the Project and, thus, will be less than significant, and no mitigation measures are required.

5. Subsidence

The Project Site is not located within an area of known ground subsidence and no large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or is planned at the Project Site. Historically high groundwater is reported to be at a depth of approximately 70 to 80 feet below grade, and no groundwater was encountered at a maximum depth of 70.5 feet during exploration. However, if groundwater is encountered during construction of the Project, temporary dewatering or other withdrawals of groundwater can be required within the Project Site. If dewatering is required, adherence to applicable NPDES Permit and industrial user sewer discharge permit requirements will ensure operation of the temporary dewatering system has a minimal effect on local groundwater recharge in the vicinity of the Project Site. In addition, a permanent dewatering system during Project operation will result in only minor impacts to the top of the groundwater table and will not affect the groundwater table. Thus, based on the level of groundwater and the absence of any large-scale extraction of groundwater, gas, oil, or

geothermal energy at the Project Site, the Project does not exacerbate, cause, or accelerate geologic hazards related to subsidence. Therefore, impacts related to subsidence are less than significant, and no mitigation measures are required.

6. Groundwater

The historic high groundwater level beneath the Project Site is at a depth of approximately 70 to 80 feet below the existing ground surface and no groundwater was encountered at the maximum explored depth of 70.5 feet. The maximum depth of excavation will range down to 78 feet below the existing ground surface. Consequently, in the event groundwater is encountered during construction of the Project, temporary dewatering or other withdrawals of groundwater can be required within the Project Site. However, as discussed in Section IV.G, Hydrology and Water Quality, of the Draft EIR, if dewatering is required, adherence to applicable National Pollutant Discharge Elimination System (NPDES) Permit and industrial user sewer discharge permit requirements will ensure operation of the temporary dewatering system has a minimal effect on local groundwater recharge in the vicinity of the Project Site. In addition, a permanent dewatering system during Project operation results in only minor impacts to the top of the groundwater table and does not affect any supply wells. Therefore, potential geologic hazards from groundwater are less than significant, and no mitigation measures are required.

7. Expansive and Corrosive Soils

Based on the Geotechnical Report, expansive soils were not observed in the near-surface soils. Therefore, expansive soils are not expected to affect structures and improvements at or near the current ground surface (e.g., building slabs, sidewalks, pavements at the current ground surface; and underground utilities). While potentially expansive soils known as fat clays were encountered at depths of approximately 25 to 30 feet below ground surface, proposed building foundations will not be affected as the extent of the excavation is deeper than these soils. If encountered, such soils will be removed during excavation. Furthermore, with the incorporation of Site-specific geotechnical recommendations, impacts related to expansive soils are not exacerbated by the Project and, thus, are less than significant.

The on-Site near-surface soils underlying the Project Site were found to have a corrosive potential for buried metal. Thus, the Geotechnical Report recommends that all underground metal pipes/clamps/structures should consider the corrosion potential. With the implementation of Site-specific geotechnical recommendations, which will require the consultation of a corrosion expert to evaluate options for underground metal protection, impacts related to corrosive soils will not be exacerbated by the Project and, thus, will be less than significant.

8. Other Geologic Conditions

There are no distinct and prominent geologic or topographic features (i.e., hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands) on the Project Site or in its vicinity. Therefore, the Project will not destroy, permanently cover, or materially and adversely modify any distinct and prominent geologic or topographic features. Impacts associated with landform alteration will not occur, and no mitigation measures are required.

9. Cumulative Impacts

Due to the Site-specific nature of geological conditions (i.e., soils, geological features, subsurface features, seismic features, etc.), geology impacts are typically assessed on a Project-by-Project basis, rather than on a cumulative basis. Nonetheless, cumulative growth through 2022 in the Project area (inclusive of the 145 related projects identified in Section III, Environmental Setting, of the Draft EIR) will expose a greater number of people to seismic hazards. However, as with the Project, the related projects are subject to established guidelines and regulations pertaining to building design and seismic safety, including those set forth in the California Building Code and the Los Angeles Building Code. Therefore, with adherence to applicable regulations, Project impacts with regard to the exacerbation of geological and soils conditions will not be cumulatively considerable, and cumulative impacts with regard to geology and soils will be less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on geology and soils.

F. **Hazards and Hazardous Materials**

1. Construction Impacts

(a) **Hazardous Materials Use and Storage**

During demolition and building construction, fuel and oils associated with the operation of construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners, could be used, handled, and stored on the Project Site. The use, handling, and storage of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people, schools within 0.25 mile, and the environment to hazardous materials. The Project Site is in proximity to several sensitive uses, including Hollywood High School (across Highland Avenue and approximately 100 feet west of Development Parcel A), Selma Elementary School (approximately 175 feet east of Development Parcel D), Blessed Sacrament Catholic School (adjacent to the east of the Project Site), and residential uses, that will be affected by construction-related hazardous materials. However, the Project Site is not located on a Site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, shall not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Additionally, all potentially hazardous materials will be used and stored in accordance with manufacturers' instructions. Applicable laws and regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. Therefore, compliance with all applicable federal, state, and local requirements concerning the use, storage, and management of hazardous materials shall effectively reduce the potential for Project construction activities to expose people or schools to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Therefore, impacts related to the use, storage, and

management of hazardous materials during construction shall be less than significant, and no mitigation measures are required.

(b) Hazardous Waste Generation, Handling, and Disposal

During demolition and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives could be used and, therefore, shall require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. The Project Site is in proximity to several sensitive uses, including Hollywood High School, Selma Elementary School, Blessed Sacrament Catholic School (adjacent to the east of the Project Site), and residential uses, that could be affected by construction-related hazardous materials. Project construction shall occur in compliance with all applicable federal, state, and local requirements concerning the generation, handling, and disposal of hazardous waste.

In addition, although the Phases I and II ESA did not identify any significant environmental concerns on the Project Site, the PCE concentrations detected within Development Parcel C are above the acceptable threshold for residential properties. Accordingly, ground disturbance associated with Site clearance, excavation, and grading activities during construction shall be required to comply with relevant and applicable federal, state, and local regulations and requirements, including DTSC and RCRA requirements (e.g., 22 CCR Division 4.5 Sections 66250 through 69013 and 8 CCR Section 5192) for proper Site cleanup and disposal from the Site by licensed hazardous waste transporters. Compliance with these requirements shall prevent releases of hazardous waste and ensure that Project construction activities shall not expose people or schools to a substantial risk resulting from the release or explosion of a hazardous material. In addition, these regulatory requirements shall prevent exposure to a health hazard in excess of regulatory standards. Therefore, impacts associated with hazardous waste management during construction shall be less than significant, and no mitigation measures are required.

(c) Underground and Aboveground Storage Tanks

The parking garage for Development Parcel A provides six levels of subterranean parking. Development Parcels B and C provides five connected/shared levels of subterranean parking underneath the two development parcels, while the parking garage for Development Parcel D provides three levels of subterranean parking. The maximum depth of excavation ranges from 36 to 78 feet below the existing ground surface. No Underground Storage Tanks (USTs) or Above Ground Storage Tanks (ASTs) were observed or identified within the Project Site. Therefore, no USTs or ASTs shall be encountered or affected during Project construction, and there shall be no potential to encounter residual subsurface contamination. Thus, impacts related to USTs and ASTs during construction shall be less than significant, and no mitigation measures are required.

(d) Asbestos-Containing Materials

Any building, structure, surface asphalt driveway, or parking lot constructed prior to 1979 could contain asbestos or Asbestos-Containing Materials (ACMs). The properties within the Project Site were developed as early as 1921. Based on the age of several of building structures, asbestos or ACMs may be present. Furthermore, during the Site reconnaissance, suspect ACMs were observed in the form of floor tiles, ceiling tiles, joint compound, and wallboard. Thus, in accordance with SCAQMD Rule 1403, the Project applicant shall be required to conduct a comprehensive asbestos survey prior to demolition, subject to approval by the Department of Building and Safety. In the event that ACMs are found within areas proposed for demolition, suspect materials shall be removed by a certified asbestos abatement contractor in accordance with applicable regulations. With compliance with relevant regulations and requirements, Project construction activities shall not expose people or schools to a substantial risk resulting from the release of asbestos fibers in the environment. Therefore, impacts related to ACMs shall be less than significant, and no mitigation measures are required.

(e) Lead-Based Paint

The existing building structures were constructed as early as the early 1920s. Thus, based on the age of the on-Site buildings, it is possible that lead-based paint (LBP) was used on-Site and could be present. During the Site reconnaissance, the paint coating of the building structures ranged from fair to good condition. In the event that LBP is found within areas proposed for demolition, suspect materials shall be removed in accordance with procedural requirements and regulations, including those established by the Toxic Substances Control Act (TSCA), 29 Code of Federal Regulations (CFR) Sections 1910 and 1926 et seq., and Titles 8 and 17 of the California Code of Regulations (CCR), for the proper removal and disposal of LBP prior to demolition activities. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of lead or materials containing lead on the Site or location at which construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards. With compliance with relevant regulations and requirements, Project construction activities shall not expose people or schools to a substantial risk resulting from the release of LBP into the environment. Therefore, impacts related to LBP shall be less than significant, and no mitigation measures are required.

(f) Polychlorinated Biphenyls

Based on the age of the existing on-Site structures, and the observation of fluorescent light fixtures during the Site reconnaissance, on-Site ballasts containing Polychlorinated Biphenyls (PCB) concentrations above the federal account limit may be present. Therefore, in the event that PCBs are found within areas proposed for demolition, suspect materials shall be removed in accordance with all applicable local, state and federal regulations prior to demolition activities, including but not limited to 40 CFR 761.30: "Fire Rule." Specifically, the disposal of PCB wastes is regulated by 40 CFR 761 to ensure the safe handling of these materials. With compliance with relevant regulations and requirements, Project construction activities shall not expose people or schools to a substantial risk resulting from the release of PCBs in the environment. Therefore, impacts related to PCBs shall be less than significant, and no mitigation measures are required.

(g) Oil Wells and Methane Gas

There are no oil wells on the Project Site, and the Project Site is not located within an oil field. Furthermore, the Project Site is not within a designated Methane Zone or Methane Buffer Zone. Therefore, the potential for construction of the Project to result in the accidental release or upset of subsurface methane or oil is negligible. No impacts related to oil wells and methane gas during construction shall occur during Project construction, and no mitigation measures are required.

(h) Subsurface Conditions

The current and past land uses within the Project Site were identified to assess their potential to present concerns relative to the presence of hazards and/or the handling of hazardous materials. These concerns are classified as Recognized Environmental Conditions (RECs). The maximum depth of excavation ranges from 36 to 78 feet below the existing ground surface. The RECs identified during the Phase I ESA, which are related to historical uses on the Project Site, were evaluated through Phase II subsurface sampling for volatile organic compounds (VOCs) and total petroleum hydrocarbon (TPH). The results of this assessment revealed no evidence of substantial soil contamination beneath the subject property. In addition, the Project Site is not located on a Site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, shall not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Accordingly, ground disturbance associated with Site clearance, excavation, and grading activities during construction is not anticipated to encounter hazardous subsurface conditions. Nonetheless, as set forth in Project Design Feature HAZ-PDF-1, a future sub-slab soil gas sample shall be obtained from beneath the footprint of the 6693 Sunset Boulevard property within Development Parcel C to ensure that the concentration of PCE is below the standard for the specific use to be developed at this location. Thus, construction impacts related to potential subsurface contamination shall be less than significant, and no mitigation measures are required.

(i) Emergency Response

According to the Safety Element of the City of Los Angeles General Plan, Highland Avenue, which borders the Project Site to the west, is a selected disaster route.² A Construction Management Plan shall be implemented during construction of the Project that includes street closure information, a detour plan, and a staging plan and ensures that adequate and safe access remains available within and near the Project Site during construction activities. The Construction Management Plan requires that Project construction be confined to the Project Site along Highland Avenue and, therefore, will not interfere with this route or have a significant impact on the City's emergency evacuation plan. However, although construction activities shall be short-term and temporary, Project construction activities could temporarily increase response times for emergency vehicles along Sunset Boulevard, Highland Avenue, and other main connectors due to travel time delays caused by traffic and temporary roadway closures. As part of the proposed Construction Management Plan, the Project will employ temporary traffic control measures, such as flag persons, to manage traffic movement during temporary traffic flow disruptions. Traffic management personnel will be trained to

² Los Angeles General Plan Safety Element, Exhibit H, *Critical Facilities and Lifeline Systems*, November 1996, p. 61.

assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) shall also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow are maintained on adjacent rights-of-way. Therefore, with implementation of a Construction Management Plan, construction of the Project shall not significantly impair implementation of, or physically interfere with, any adopted or on-Site emergency response or evacuation plans. Impacts related to emergency response and evacuation during construction shall be less than significant, and no mitigation measures are required.

2. Operation Impacts

(a) Hazardous Materials Use and Storage

Operation of the Project shall involve the limited use of potentially hazardous materials typical of those used in residential, commercial, and hotel developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. All potentially hazardous materials shall be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations. Any risks associated with these materials shall be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, as the Project shall comply with applicable regulations and shall not expose persons or schools to substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards, impacts associated with the use and storage of these hazardous substances during operation of the Project shall be less than significant, and no mitigation measures are required.

(b) Hazardous Waste Generation, Handling, and Disposal

Development of the Project will involve the use of hazardous materials typically associated with residential, office, hotel, entertainment and retail use. Since the Project does not propose any industrial uses, these materials present a low risk for hazards exposure. Notwithstanding, as is the case under existing conditions, activities involving the handling and disposal of hazardous wastes on-Site shall occur in compliance with all applicable federal, state, and local requirements concerning the handling and disposal of hazardous waste. Furthermore, hazardous wastes shall continue to be properly stored and conveyed to licensed waste treatment, disposal, or recycling facilities. Therefore, with compliance with relevant regulations and requirements, operational activities shall not expose people or schools to a substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard associated with hazardous waste in excess of regulatory standards. Thus, impacts associated with hazardous waste generation, handling, and disposal during operation of the Project shall be less than significant, and no mitigation measures are required.

(c) Underground and Aboveground Storage Tanks

Fuel storage tanks will be used to power the generators for the Project. Although the type and quantity of storage tanks are unknown at this time, their use will be subject to the applicable requirements of the CCR, CFR, and HSC for regulating the storage of hazardous substances in USTs and ASTs, including but not limited to regulations found

in 40 CFR 280, California HSC, Division 20, Chapter 6.7, 23 CCR Section 2610, 40 CFR Part 112 of the Clean Water Act, and HSC Section 25270.8, as identified above in the Regulatory Framework. With compliance with relevant regulations and requirements, Project use of storage tanks shall not expose people or schools to a substantial risk resulting from the release of VOCs, including benzene, toluene, and PCE, and other chemicals associated with the use of fuel storage tanks. Thus, impacts associated with USTs and ASTs shall be less than significant, and no mitigation measures are required.

(d) Asbestos-Containing Materials

Development of the Project shall include the use of commercially-sold construction materials that shall not include asbestos or ACMs. Project development is, therefore, not anticipated to increase the occurrence of friable asbestos or ACMs at the Project Site. Therefore, operation of the new development at the Project Site shall not expose persons or schools in the immediate vicinity to any risk resulting from the release of friable asbestos in the environment. Thus, no impacts associated with asbestos or ACMs during operation of the Project shall occur, and no mitigation measures are required.

(e) Lead-Based Paint

Development of the Project includes the use of commercially sold construction materials that do not include lead-based paint. Project development is therefore not anticipated to increase the occurrence of lead-based paint at the Project Site. Operation of the new development proposed at the Project Site shall not expose persons or schools in the immediate vicinity to lead-based paint, as no lead-based paints shall be used. As such, the Project does not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Thus, impacts associated with lead-based paint during operation of the Project shall be less than significant, and no mitigation measures are required.

(f) Polychlorinated Biphenyls

In accordance with existing regulations, the new electrical systems to be installed as part of the Project do not contain PCBs. Therefore, during operation of the Project, maintenance of such electrical systems shall not expose people or schools in the immediate vicinity to PCBs. In addition, the Project applicant shall comply with applicable laws regulating PCBs, including but not limited to 40 CFR 761, in addition to federal, state, and local regulations. As such, operation of the Project shall not expose people or schools to any risk resulting from the release of PCBs in the environment. Therefore, no impacts related to PCBs during Project operation shall occur, and no mitigation measures are required.

(g) Oil Wells and Methane Gas

The Project Site is not within a designated Methane Zone or Methane Buffer Zone. There are no oil wells on the Project Site, and the Project Site is not located within an oil field. Therefore, the Project does not expose people or schools to any risk resulting from the release or explosion of oil or methane gas, or from exposure to a health hazard associated with oil or methane gas. Thus, no impacts associated with oil and methane gas during operation of the Project shall occur, and no mitigation measures are required.

(h) Subsurface Conditions

The subsurface Site assessment of the identified RECs related to historical uses on-Site did not yield evidence of substantial soil contamination beneath the Project Site as detected levels of hazardous materials were below threshold levels under the California Human Health Screening Levels (CHHSL) adopted by the state of California in 2005. As such, the Phases I and II ESA determined that no further action regarding the RECs is required. The historical dry cleaning facility (6693 Sunset Boulevard) located within Development Parcel C detected a PCE concentration of 0.24 µg/l, which is below the CHHSL for commercial properties but is above the acceptable concentration for residential properties. This portion of the Project Site shall be developed with entertainment and retail/restaurant uses and shall not include residential uses. In addition, the Project Site is not located on a Site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, shall not exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment. Nonetheless, as set forth in Project Design Feature HAZ-PDF-1, an additional soil gas sample shall be obtained from beneath the footprint of this portion of Development Parcel C to ensure that the concentration of PCE is below the standard for the specific use to be developed at this location, and the Project shall not exacerbate existing conditions. Therefore, impacts related to hazards from subsurface conditions shall be less than significant.

(i) Emergency Response

During operation, the Project shall not involve any activities that impede public access or travel along the public right-of-way or interfere with an adopted emergency response or evacuation plan. Emergency vehicles shall continue to access the Project Site directly from the surrounding roadways, including Selma Avenue, McCadden Place, N. Las Palmas Avenue, Sunset Boulevard, and Highland Avenue. In addition, the increase in traffic generated by the Project shall not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along City-designated disaster routes (e.g., Highland Avenue along the western boundary of the Project Site), because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, Project operation, including traffic generated by the Project, shall not cause a substantial effect on emergency response as a result of increased traffic congestion. As such, impacts associated with emergency response and emergency evacuation plans shall be less than significant.

3. Cumulative Impacts

The related projects in the vicinity of the Project Site include retail, restaurant, residential, commercial and office uses. Each of the related projects shall require evaluation for potential threats, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, LBP, PCBs, and oil and gas, to public safety and schools in the Project vicinity and shall be required to comply with all applicable local, state, and federal laws, rules and regulations. Because environmental safety issues related to hazardous materials are largely Site-specific, this evaluation shall occur on a case-by-case basis for each individual Project affected, in conjunction with development proposals on these properties.

According to the Safety Element of the City of Los Angeles General Plan, Highland Avenue and Santa Monica Boulevard are selected disaster routes.³ Although some related projects may have the potential to result in physical modifications to these streets, both Project construction and operation does not require or result in any modifications to either roadway. In addition, the Project shall not impede the implementation of any emergency response plan. Therefore, with full compliance with all applicable local, state, and federal laws, rules, and regulations and the implementation of Project Design Feature HAZ-PDF-1, the Project shall not have a cumulatively considerable contribution to impacts related to hazards and hazardous materials or selected disaster routes and emergency response plans. As such, the Project's impacts with regard to these issues shall be less than significant.

Project Design Features

The City finds that Project Design Feature HAZ-PDF-1, which is incorporated into the Project and are incorporated into these Findings as though fully set forth herein, reduce the potential impacts of the Project related to hazards and hazardous material. This Project Design Feature was taken into account in the analysis of potential impacts.

G. Hydrology and Water Quality

1. Surface Water Quality, Groundwater, Surface Water Flood Hazards, Hydrology/Drainage

(a) Construction

(1) Surface Water Hydrology

Project construction activities for the demolition of existing uses and construction of new buildings require grading and excavation that could have had the potential to temporarily alter the existing surface drainage patterns and flows within the Project Site. During the process, exposing underlying soils will divert existing surface flows and make the Project Site temporarily more permeable. However, the Project will comply with all applicable City grading permit regulations, including, but not limited to, the Los Angeles Green Building Code, LAMC, and Low Impact Development (LID) requirements, that require necessary measures, plans, and inspections to reduce flooding, sedimentation, and erosion. Thus, through implementation of BMPs and compliance with applicable City grading regulations, the Project is not substantially altering the Project Site drainage patterns in a manner that results in substantial erosion, siltation, and flooding on- or off-Site. Similarly, adherence to standard compliance measures, such as preparation and implementation of a SWPPP, during construction activities ensures that the Project does not cause flooding that has the potential to harm people or damage property or sensitive biological resources; substantially reduce or increase the amount of surface water flow from the Project Site into a water body; or result in a permanent, adverse change to the movement of surface water to produce a substantial change in the current or direction of water flow during construction.

³ Los Angeles General Plan Safety Element, Exhibit H, *Critical Facilities and Lifeline Systems*, November 1996, p. 61.

During construction, soils will be exposed and runoff will be decreased due to the ability of stormwater to infiltrate the ground. However, the Project will adhere to requirements of LAMC Sections 91.7013 and 91.7014, which pertain to erosion control, drainage, and general construction requirements, including flood and mudflow protection. On-Site stormwater flows will be managed and directed off-Site to not overwhelm the existing stormwater drainage infrastructure, and post-construction runoff flow rate is not expected to change significantly. Therefore, with adherence to all applicable regulations, construction-related impacts to surface water hydrology are less than significant, and no mitigation measures are required.

(2) Surface Water Quality

Due to its location and size, the Project has been designated under Risk Level 2 monitoring and subject to the NPDES Construction General Permit. Through compliance with NPDES requirements, including preparation and implementation of a SWPPP and City grading regulations of Sections 91.7013 and 91.7014 of the LAMC, Project construction will not result in discharges that will create: (1) pollution that will alter the quality of the water of the state (i.e., Santa Monica Bay) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) a nuisance that will be injurious to health, affect an entire community or neighborhood or any considerable number of persons, and occurs during or as a result of the treatment or disposal of wastes. The SWPPP will provide for the use of BMPs, such as sandbags to direct flows, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management. Furthermore, Project construction will not result in discharges that will cause violations of regulatory standards within Santa Monica Bay. Therefore, construction-related impacts to surface water quality are less than significant, and no mitigation measures are required.

(3) Groundwater Hydrology

The Project Site currently consists of 90 percent impervious surfaces. As such, no appreciable recharge occurs at the Project Site. In addition, since the closest groundwater production wells or public water supply wells are located in the City of Beverly Hills, over one mile southwest of the Project Site, construction activities are not anticipated to affect existing wells. Therefore, construction of the Project will not change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, or result in a demonstrable and sustained reduction of groundwater recharge capacity.

Since the Project's development of subterranean parking structures may extend up to 78 feet below existing grade, construction may encounter groundwater, which has been historically found at approximately 70 to 80 feet below existing grade at the Project Site. In this event, temporary dewatering or withdrawal of groundwater may be required. Dewatering systems will extract, treat, and discharge the water into the public storm drain or sewer system, as determined by the City. If dewatering is required, compliance with applicable NPDES permitting and industrial user sewer discharge requirements ensures that the operation of a temporary dewatering system has a minimal effect on local groundwater recharge within the Project Site's vicinity. Therefore, the Project does not adversely impact the flow rate or direction of groundwater and does not have an adverse

effect on any water supply wells. Impacts are less than significant, and no mitigation measures are required.

(4) Groundwater Quality

While a search of state records showed that the Project Site does not have a history of known hazardous material spills or contaminated soil, a subsurface assessment detected PCE in multiple soil borings, specifically in excess for residential properties under Development Parcel C, as discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. As a result, ground disturbance associated with construction Site clearance, excavation, and grading activities is required to comply with applicable federal, state, and local regulations and requirements, including DTSC and RCRA requirements (e.g., CCR Titles 8 and 22 and 42 USC Section 6901-6992k, respectively), for proper Site cleanup and disposal from the Site by licensed hazardous waste transporters. As identified in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, compliance with these requirements and the Project's incorporation of Project Design Feature HAZ-PDF-1 prevent releases of PCE and ensure that construction activities do not affect the rate or change direction of movement of existing contaminants, expand the area affected by contaminants, result in increased groundwater contamination, or cause regulatory water quality standards at an existing production well to be violated.

In addition, since surface contaminants have the potential to adversely impact groundwater quality, hazardous materials used during on-Site grading and construction (e.g., fuels, paints, solvents, concrete additives, etc.) require proper management and disposal to prevent hazardous material releases into groundwater. Compliance with all applicable federal, state, and local requirements (including DTSC and RCRA requirements) concerning the handling, storage and disposal of hazardous waste, as identified in Section IV.F, Hazards and Hazardous materials, of the Draft EIR, reduces the potential for Project construction to release contaminants that could affect the rate or direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or violate regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities are not anticipated to affect existing wells. Accordingly, Project impacts on groundwater quality are less than significant, and no mitigation measures are required.

(b) Operation

(1) Surface Water Hydrology

Since post-construction land uses will be similar to those currently on the Project Site, Project implementation will also result in the existing 90 percent of impervious and 10 percent of pervious surfaces. There will be virtually no increase or decrease in imperviousness that will substantially increase runoff volumes into the existing storm drain system.

The Project slightly alters on-Site drainage patterns. Under existing conditions, the Project Site was comprised of 18 drainage subareas that drain to existing off-Site basins and adjacent storm drains, whereas under post-development conditions, the Project Site is comprised of 11 drainage areas that drain to both existing and proposed off-Site basins

and adjacent storm drains. While the Project slightly alters flow distribution, the total drainage area does not change. Under existing conditions, most stormwater sheet flows drain from the Project Site without filtration or capture devices. The Project allows for stormwater collection through a first flush filtration system of rain gardens, permeable pavement, and stormwater filtration plants to collect roof water. The Project's stormwater treatment reduces pollution from roof drainage, area drains, and surface runoff and reduces the volume discharged to the public storm drain system. In the Project condition, there is an overall reduction in stormwater runoff as compared to existing conditions. In addition, with the implementation of a LID plan, the Project provides post-construction BMPs to control runoff and pollutants associated with storm events per the City's Stormwater Program. Adhering to the LID requirements, the Project's BMPs controls and does not increase runoff from the Project Site.

Based on the above, the Project does not result in any incremental impact on either on-Site or off-Site flooding during a 50-year storm event, substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water that results in an incremental effect on the capacity of the existing storm drain system. As such, operation of the Project results in a less-than-significant impact on surface water hydrology, and no mitigation measures are required.

(2) Surface Water Quality

As the Project is subject to the requirements for "All Other Development" in the City of Los Angeles LID Manual, Section 3.1.2, the Project will comply with requirements to ensure that the impacts of increased runoff and stormwater pollution are mitigated as close to its source as possible. The Project is designed to have drainage systems that intercept and convey all on-Site rainfall runoff and implement infiltration BMPs, which can provide for percolation, benefit pollutant removal, control peak flow, recharge groundwater, and control flooding. While infiltration should be feasible at the Project Site, if needed, a stormwater capture and reuse system will be implemented instead to supplement irrigation demand and reduce stormwater runoff.

The Project will maintain approximately the same percentage of impervious surface area as under existing conditions. Under existing conditions, most runoff from the Project Site was discharged without any controls. In order to comply with LID requirements, the Project will implement BMPs to reduce the quantity and improve the quality of rainfall runoff from the Project Site. The infiltration system is designed in accordance with the City of Los Angeles infiltration guidelines and the Project-specific infiltration recommendations prepared by the designated geotechnical engineer. While infiltration should be feasible at the Project Site, if needed, a stormwater capture and reuse system will be implemented instead to supplement irrigation demand and reduce stormwater runoff.

Due to the incorporation of infiltration BMPs and for the reasons discussed above, operation of the Project does not result in discharges that cause: (1) pollution which alters the quality of the waters of the state (i.e., Santa Monica Bay) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that is injurious to health; affects an entire community or neighborhood, or any considerable number of

persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, operation of the Project does not result in discharges that violate regulatory standards. Therefore, impacts to surface water quality are less than significant, and no mitigation measures are required.

(3) Groundwater Hydrology

With implementation of the Project, there will be virtually no incremental increase or decrease in the imperviousness of the Project Site that could affect groundwater recharge rates on-Site. Due to the high percentage of impervious surface at the Project Site (i.e., 90 percent imperviousness), no appreciable groundwater recharge currently occurs. However, at the depths of excavation during construction, groundwater may be encountered and will prompt the consideration of two possible alternative structural design methods—a permanent dewatering system, or a system that withstands hydrostatic groundwater pressures, as discussed in Section IV.G, Hydrology and Water Quality, of the Draft EIR. Either system will result in only minor impacts to the top of the groundwater table and will not affect any supply wells. Additionally, no water supply wells exist on-Site or within 1 mile of the Project Site, and the Project does not include the construction of water supply wells. Therefore, operation of the Project does not change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, or result in a demonstrable and sustained reduction of groundwater recharge capacity. Impacts are less than significant, and no mitigation measures are required.

(4) Groundwater Quality

Leaking underground storage tanks have a potential to affect groundwater. As discussed in greater detail in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR, there are no open Leaking Underground Storage Tank (LUST) cleanup sites within 1,000 feet of the Project Site. There were four closed LUST cleanup sites within 1,000 feet of the Project Site, but since these cases are cleaned up and closed, there is a minimal chance that there will be any impact from the infiltration of stormwater occurring on the Project Site. Therefore, underground storage tanks will not have an impact on the Project Site or contribute to the spreading of underground contamination from adjacent cleanup sites.

The Project also includes the use of fuel storage tanks to power the emergency generators to be used for the Project. Although the tanks could be either above or below ground, their use is subject to the applicable federal, state, and local requirements related to the storage of hazardous substances in aboveground and underground tanks. With compliance with relevant regulations and requirements, Project use of fuel storage tanks does not have an impact on or contribute to the spreading of underground contamination from leaking underground storage tanks.

Surface contaminants also have the potential to adversely impact groundwater quality. The Project involves the limited use of potentially hazardous materials typical of those used in residential and commercial developments, including cleaning agents, paints, pesticides, and other landscaping materials. While the management of any resultant hazardous wastes can increase the potential of hazardous releases into the groundwater, all potentially hazardous materials will be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards

and regulations, which are discussed in Section IV.F, Hazards and Hazardous Materials, of the Draft EIR. Compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste reduces the potential for operation of the Project to release contaminants into the groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. Accordingly, Project impacts on groundwater quality are less than significant, and no mitigation measures are required.

(c) Cumulative Impacts:

Cumulative growth in the Project Site area through 2022 includes specific known development projects, as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of the Draft EIR. These related projects comprise a variety of uses, including apartments, condominiums, restaurants, and retail uses, as well as mixed-use developments incorporating some or all of these elements.

(1) Surface Water Hydrology

The geographic context for the cumulative impact analysis on surface water quality is the Santa Monica Bay Watershed. The Project, in conjunction with forecasted growth in the Santa Monica Bay Watershed, could cumulatively increase stormwater runoff flows. However, the Project has no net impact on stormwater flows. Also, in accordance with City requirements, related projects and other future development projects will be required to implement BMPs to manage stormwater in accordance with LID guidelines. Furthermore, the City of Los Angeles Department of Public Works reviews each future development Project on a case-by-case basis to ensure sufficient local and regional infrastructure is available to accommodate stormwater runoff. Therefore, the Project's contribution to cumulative impacts to surface water hydrology is not cumulatively considerable, and cumulative impacts are less than significant.

(2) Surface Water Quality

Future growth in the Santa Monica Bay Watershed is subject to NPDES requirements relating to water quality for both construction and operation. In addition, since the Project Site is located in a highly developed urban area, future land use changes or development are not likely to cause substantial changes in regional surface water quality. The Project does not have an adverse impact on water quality and improves the quality of on-Site flows due to the introduction of new BMPs that collect, treat, and discharge runoff from the Project Site. Also, it is anticipated that the Project and other future development projects will be subject to LID Standard Urban Stormwater Mitigation Plan (SUSMP) and/or SWPPP requirements and implementation of measures to comply with total maximum daily loads (TMDL) requirements. Increases in regional controls associated with other elements of the NPDES permit will improve regional water quality over time. Therefore, because the Project does not have an adverse impact, and given the Project's and the related projects' compliance with all applicable laws, rules, and regulations pertaining to stormwater runoff, the Project's contribution to cumulative impacts to surface water quality is not cumulatively considerable. As such, cumulative impacts are less than significant.

(3) Groundwater Hydrology

Cumulative groundwater hydrology impacts could result from the overall utilization of groundwater basins that encompass or that are located in proximity to the Project Site and related projects. In addition, interruptions to existing hydrology flow by dewatering operations of underground water will have the potential to affect groundwater levels. However, no water supply wells, spreading grounds, or injection wells are located within a 1-mile radius of the Project Site, and any calculation of the extent to which the related projects will extract or otherwise directly use groundwater will be speculative. As with the Project, any related Project will be required to evaluate its individual impacts to groundwater hydrology due to temporary or permanent dewatering operations.

Other proposed projects within the groundwater basin will incorporate structural designs for subterranean levels that are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. If any of the related projects require permanent dewatering systems or extend excavation beneath groundwater levels, such systems will be regulated by State Water Resources Control Board (SWRCB) permit requirements. Project operation does not incrementally increase or reduce the imperviousness of the Project Site in a manner that could affect groundwater recharge rates on-Site. As a result, the Project will not change potable water levels sufficiently to reduce the ability of the water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, or result in a demonstrable and sustained reduction of groundwater recharge capacity. Therefore, the Project's contribution to cumulative impacts to groundwater hydrology is not cumulatively considerable. As such, cumulative impacts are less than significant.

(4) Groundwater Quality

Compliance with all applicable existing regulations at the Project Site prevents the Project from affecting or expanding any potential areas affected by contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the CCR Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act. As with the Project, the related projects are unlikely to cause or increase groundwater contamination because compliance with existing statutes and regulations will similarly prevent the related projects from affecting or expanding any potential areas affected by contamination, or increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated. Therefore, the Project's contribution to cumulative impacts to groundwater quality is not cumulatively considerable. As such, cumulative impacts are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts on hydrology and water quality.

H. Land Use and Planning

Consistency with Local Plans and Applicable Policies

(a) Los Angeles General Plan

The General Plan of the City of Los Angeles serves as a comprehensive, long-term plan for future development of the City to guide land use policies and meet the existing and future needs of the community. The General Plan consists of a series of documents that include the seven state-mandated elements: Land Use, Circulation, Noise, Safety, Housing, Open Space, and Conservation. In addition, the City's General Plan includes elements addressing Air Quality, Historic Preservation and Cultural Resources, Infrastructure Systems, Public Facilities and Services, and Health and Wellness, as well as the Citywide General Plan Framework Element (General Plan Framework Element). The Land Use Element is comprised of 35 local area plans known as Community Plans that guide land use at the local level. The Project Site is located within the boundaries of the Hollywood Community Plan area.

(1) Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element, adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the Community Plans and most of the City's General Plan Elements. Specifically, the General Plan Framework Element defines Citywide policies for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

Land Use Chapter. As detailed in Table IV.H-2 on page IV.H-33 of the Draft EIR, the Project will support and be generally consistent with the General Plan Framework Element's Land Use Chapter. The Project will contribute to the achievement of many of the applicable goals, objectives, and policies regarding the provision of a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors through the development of new residential, hotel, office, and commercial/retail uses and through the rehabilitation of the Crossroads of the World complex and the Hollywood Reporter Building and the Bullinger Building. The Project will be located in an area well-served by Metro and LADOT public transportation options with convenient access to public transit and opportunities for walking and biking that will promote an improved quality of life by facilitating a reduction of vehicle trips and miles traveled and air pollution, while supporting the City's objective to encourage new hotel, multi-family residential, retail, commercial, and office development along primary transit corridors/boulevards. The Project will accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6 of the General Plan Framework's Land Use Chapter. With approval of the requested discretionary actions, the Project will comply with the Framework Element Long-Range Land Use Diagram, which envisions the Project area as a regional center and a focal point of regional commerce, identity, and activity and containing a diversity of uses with floor area ratio (FAR) from 1.5:1 to 6.0:1. The Framework Element recognizes regional centers to be characterized by 6- to 20-stories (or higher) and usually major transportation hubs.

The Project is consistent with the General Plan Framework Element's Land Use Chapter because it consists of a mixed-use development that will create a new urban district, while retaining the historic setting of the Crossroads of the World complex. The Project will integrate Crossroads of the World into a new, mixed-use development that will include

eight new mixed-use buildings with residential, hotel, commercial/retail, office, entertainment, and restaurant uses, and a new stand-alone one-story commercial/retail building in the Crossroads of the World complex. The Project will include a new hotel, multi-family residential, and retail/commercial development along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods. These uses are consistent with the General Plan Framework's Regional Center designation for the Project Site. Thus, the Project will comply with the General Plan Framework Element's Land Use Chapter.

Housing Chapter. The Project will be consistent with the relevant objectives that support the goals of the General Plan Framework's Housing Chapter. The Project will support the City's objective to plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types through the development of 950 residential units. Of the residential units, 105 units shall be dedicated as affordable housing units (i.e., Very Low Income household dwelling units) to replace the existing 84 rent-stabilized units that the Project removes. The residential units will include a mix of studio, one-, and two-bedroom units. In addition, the Project will encourage the location of new multi-family housing to occur in proximity to transit corridors, including Metro and LADOT bus stops along Sunset Boulevard and Highland Avenue and proximity to the Metro Red Line Hollywood/Highland Station. Therefore, the Project will be generally consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Housing Chapter.

Urban Form and Neighborhood Design Chapter. As set forth in Table IV.H-2 on pages IV.H-40 through 41 of the Draft EIR, the Project will also be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Urban Form and Neighborhood Design Chapter. The Project will specifically support the City's goal to provide a livable City for existing and future residents by introducing a new mixed-use development with new residential, office, hotel, and commercial/retail uses. In addition, the Project will be consistent and compatible with the mix of neighborhood-serving commercial/retail uses, tourist and entertainment-related commercial/retail uses, offices, hotels, and institutional land uses surrounding the Project Site and will serve the surrounding community and future businesses. The new mixed-use development is designed to create a vibrant transit oriented development that connects with the urban fabric of Hollywood and also retains the historical identity of the Crossroads of the World complex and the Hollywood Reporter Building and the Bullinger Building. The Project will include building design features in a contemporary architectural style. The Project consists of landscaped public walkways that will promote access and connectivity to and through the Project Site from Sunset Boulevard, Highland Avenue, Las Palmas Avenue, Selma Avenue, and McCadden Place. Furthermore, Project lighting will incorporate low-level exterior lights adjacent to buildings and along pathways for security and wayfinding purposes and to accent signage, architectural features, and landscaping elements. Therefore, the Project will be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Urban Form and Neighborhood Design Chapter.

Open Space and Conservation Chapter. The Project is also consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Open Space and Conservation Chapter. Through private development, the Project enhances the open space resources of the surrounding neighborhoods, by providing a total of

approximately 101,075 square feet of open space, consisting of approximately 22,200 square feet of interior amenity space, 51,225 square feet of common open space, and approximately 27,650 square feet of private open space (i.e., balconies), in accordance with the open space provisions for new residential projects set forth in LAMC Section 12.21-G. Furthermore, the existing Crossroads of the World courtyards and the continuation of the plaza between Buildings C1 and C2 provide an additional 41,800 square feet of open space, as well as approximately 23,500 square feet of additional pedestrian paseo. When including the pedestrian paseo and the existing courtyards that are accessible to both the Project residents and the general public, the open space provided within the Project Site totals approximately 166,375 square feet. The Project also promotes the development of public open space that is visible and safe by providing sufficient lighting along the walkways and courtyards, as well as a closed circuit camera system.

Rooftop amenities will include a pool and pool terrace, club room, lounge, entertainment terrace, and artificial turf game lawn. Landscaped courtyards will be located on the podium level and roof level; private patios and balconies will be provided within the residential units; and a private gym is proposed along the Las Palmas Avenue frontage. Landscaped planters and hardscape features will be distributed throughout the podium and rooftop levels, and perimeter landscaping will be installed at the ground level. Due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, Project residents and employees will utilize on-Site open space to meet their recreational needs and reduce the Project's demand on public parks and recreational facilities. Therefore, the Project will be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Open Space and Conservation Chapter.

Economic Development Chapter. The Project will be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Economic Development Chapter. As provided on Table IV.H-2 on page IV.H-33 of the Draft EIR, the Project will support the City's objective to establish a balance of land uses through the development of a mixed-use Project with residential, hotel, office, commercial/retail, and entertainment uses in an area well-served by public transit. The proposed neighborhood-serving retail and restaurant uses will complement the employment base (e.g., existing office and hotel uses, entertainment venues, and tourist attractions) of the Community Plan area, meet the needs of local residents, and foster continued economic investment. The Project will promote and encourage the development of retail facilities appropriate to serve the shopping needs of the local population by providing approximately 185,000 square feet of commercial/retail and entertainment uses, including a supermarket, that will serve the surrounding neighborhood. In addition, the Project will concentrate its commercial development in regional mixed-use centers, around transit stations, and within community centers by developing approximately 190,000 square feet of commercial uses in proximity to public transit. Thus, the Project will be consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Economic Development Chapter.

Transportation Chapter/Mobility Plan 2035. The Project will also be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Transportation Chapter and Mobility Plan 2035. Specifically, the Project will support the City's objective to mitigate the impacts of traffic growth through the implementation of a

Transportation Demand Management Plan that will include strategies to promote non-auto travel and reduce the use of single-occupant vehicle trips. The Project will also promote the City's policy to include bicycle storage and parking facilities (e.g., bike racks for residents and Project patrons/employees and showers for employees) by providing approximately 1,241 bicycle parking spaces. With respect to Mobility Plan 2035, the Project will support the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a Construction Management Plan that will incorporate safety measures around the construction Site to reduce the risk to pedestrian traffic near the work area; minimize the potential conflicts between construction activities, street traffic, transit stops, and pedestrians; and reduce the use of residential streets and congestion to public streets and highways. The Project will ensure high quality pedestrian access in all Site planning and public right-of-way modifications to provide a safe and comfortable walking environment. The Project recognizes all modes of travel by providing adequate vehicular access, improving pedestrian access, and providing bicycle facilities. Additionally, given the location of the Project Site along and in proximity to major transit corridors, the Project will provide all residents, guests, employees, and visitors with convenient access to transit services. Therefore, the Project will be generally consistent with the applicable policies that support the goals and objectives set forth in Mobility Plan 2035 and the General Plan Framework's Transportation Chapter.

Infrastructure and Public Services Chapter. The Project will be consistent with the relevant objectives and policies that support the goals of the General Plan Framework's Infrastructure and Public Services Chapter. Specifically, the Project will support the City's policy and objective to reduce the amount of hazardous substances and the total amount of flow entering the stormwater system, as well as pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality by implementing a Stormwater Pollution Prevention Plan during construction that will include best management practices (BMPs) and other erosion control measures to minimize the discharge of pollutants in stormwater runoff. During operation, the Project will include BMPs to collect, detain, treat, and discharge runoff on-Site before discharging into the municipal storm drain system as part of the Standard Urban Stormwater Mitigation Plan. Implementation of Project BMPs will result in an improvement in surface water quality runoff from the Project Site. Furthermore, as discussed in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of the Draft EIR, the Los Angeles Department of Water and Power will be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. Therefore, the Project will be generally consistent with the applicable objectives and policies that support the goals set forth in the General Plan Framework's Infrastructure and Public Services Chapter.

Based on the analysis above, the Project will be consistent with the relevant goals, objectives, and policies of the General Plan Framework.

(2) Los Angeles General Plan Conservation Element

The Conservation Element established an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or

property modification activities. The Project's consistency with this objective and this policy is analyzed below.

Specifically, the Project will retain, rehabilitate, and revitalize Crossroads of the World, a designated City Cultural-Historic Monument (Monument #134) that is also listed on the National Register of Historic Places and the California Register of Historical Resources. The Project will also retain, rehabilitate and revitalize the former Hollywood Reporter Building, a City Cultural-Historic Monument designated after the release of the Draft EIR, and the Bullinger Building, a building found eligible for listing in the California Register in the 2010 Hollywood Redevelopment Project Area Historic Resources Survey and concluded to be an historical resource in the EIR. The Project proposes to redevelop the Project Site with a cohesive, mixed-use development that retains Crossroads of the World within a collection of new buildings of modern design and creates an open-air pedestrian district with a mix of shopping, dining, and entertainment uses. However, to accommodate the new mixed-use development, the Project will demolish four properties that have been determined to be eligible for listing on the California Register through survey evaluation. With implementation of Mitigation Measure CUL-MM-14, these four properties will be documented in accordance with Historic American Buildings Survey (HABS) guidelines and standards. However, the historic impact associated with the demolition of these properties cannot be mitigated to a less-than-significant level and will, therefore, be significant and unavoidable. Consequently, the demolition of these four properties will not be consistent with the objective and policy for the conservation of cultural and historic resources set forth in the Conservation Element.

(3) Los Angeles General Plan Housing Element

The Project will be consistent with the applicable policies set forth in the Housing Element of the General Plan. The Project will provide a variety of housing types in an area that is pedestrian-friendly and served by public transit; expand affordable rental housing for all income groups; facilitate new construction of a range of different housing types; expand opportunities for residential development, particularly in designated Centers; and preserve quality rental and ownership housing for households of all income levels. Specifically, the Project will develop a total of 950 residential units, 105 of which shall be Low Income Household rental units to replace the existing 84 rent-stabilized units located in Development Parcel B. Therefore, although THE Project removes 84 existing multi-family dwelling units on-Site, it replaces these units to maintain quality rental housing for households of all income levels. The Project will also promote the construction of green buildings by incorporating sustainable design features, including energy conservation, water conservation, alternative transportation programs, noise management, a pedestrian- and bicycle-friendly Site design and waste reduction measures. Therefore, the Project will be consistent with the applicable policies set forth in the Housing Element.

(4) Los Angeles General Plan Health and Wellness Element—Plan for a Healthy Los Angeles

The Project will support the applicable goals and objectives of the Health and Wellness Element by implementing a mixed-use development and incorporating a variety of open space areas within the Project Site that promote walkability and biking to contribute to the creation of a healthy community. The Project will include active and passive recreational spaces, including roof decks and pools, community rooms and

recreational facilities, courtyards, landscaped gardens, terraces, and common open space with gathering and seating areas. The Project will provide a total of approximately 101,075 square feet of open space, consisting of approximately 22,200 square feet of interior amenity space, 51,225 square feet of common open space, and approximately 27,650 square feet of private open space (i.e., balconies) in accordance with the open space provisions for new residential projects set forth in LAMC Section 12.21-G. Furthermore, the existing Crossroads of the World courtyards and the continuation of the plaza between Buildings C1 and C2 will provide an additional 41,800 square feet of open space, as well as approximately 23,500 square feet of additional pedestrian paseo. When including the proposed pedestrian paseo and the existing courtyards that are accessible to both the Project residents and the general public, the open space provided within the Project Site will total approximately 166,375 square feet. The Project will also provide approximately 239 new trees, including roof deck trees, trees along the paseo, and street trees along Highland Avenue, Selma Avenue, Las Palmas Avenue and Sunset Boulevard.

The Project will promote pedestrian activity and promote walkability in the vicinity of the Project Site by locating all of the proposed retail and restaurant uses on the ground floor of the proposed buildings, primarily along the street frontages and along the pedestrian paseo. In addition, the Project will create multimodal transit options for Project users by providing ample bicycle parking.

The Project will also incorporate elements that will promote individual and community safety. Specifically, as provided in Section IV.K.1, Public Services—Police Protection, of the Draft EIR, the Project will incorporate design strategies established in the City's initiative, "Design Out Crime," which includes the techniques of Crime Prevention Through Environmental Design (CPTED). These design strategies within the Project design include, but are not limited to: (1) limiting and locating secure access points to areas of high visibility; (2) designing hallways and corridors to be straight forward with no dark corners, as possible; (3) providing clear transitional zones between public, semi-public, and private spaces; and (4) properly lighting and providing proper signage to interior and exterior spaces to direct flow of people and reduce opportunities for crime. Also refer to Project Design Feature K.1-2 in Section IV.K.1, Public Services—Police Protection, of the Draft EIR. Therefore, the Project will be generally consistent with the applicable goals (i.e., A City Built for Health, Bountiful Parks and Open Spaces, and Safe and Just Neighborhoods) set forth in the Health and Wellness Element.

(5) Hollywood Community Plan

The Project will be consistent with the objectives and policies set forth in the Community Plan. Specifically, the Project will support the City's objective to make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community. Although the Project will result in significant and unavoidable impacts at five study intersections, the Project will partially support the City's objective to make provision for a circulation system coordinated with land uses and densities through the development of a mixed-use development. The Project will consist of new residential, hotel, office, entertainment and commercial/retail uses in a highly urbanized area that is well-served by public transit to promote better interactions between existing and new uses and among on-Site uses. In addition, the Project will enhance the overall connectivity of the Project Site to the Hollywood community and promote opportunities for the use of alternative modes of transportation, including use of public transportation and bicycling.

The Project will also support the City's objective related to service systems to provide a balance between land use and service facilities at all times. As discussed in Section IV.K, Public Services, and Section IV.M, Utilities and Service Systems, of the Draft EIR, the agencies that provide services and utilities to the Project Site will have capacity to serve the Project. The Project will also support the City's objective to locate a mixed-use development in an area well-served by public transit and promote the use of alternative modes of transportation through the provision of bicycle parking spaces. Therefore, the Project shall be consistent with the general intent of the Community Plan.

(b) Community Redevelopment Agency (CRA/LA) Hollywood Redevelopment Plan

The Project Site is designated for Regional Center Commercial within the Redevelopment Plan Area, and Development Parcel D is located within the Hollywood Boulevard District of the Redevelopment Plan Area. According to the Redevelopment Plan, Regional Center Commercial uses generally provide goods and services that are designed in a manner that appeals to regional and local markets. Regional Center Commercial uses generally include theaters, restaurants, hotels, offices, and retail or service businesses. Section 506.3 of the Redevelopment Plan also encourages the development of new and rehabilitated residential uses in the Regional Center Commercial Land Use designation. The Project will develop new residential, hotel, office, entertainment and commercial/retail uses as encouraged by the Redevelopment Plan. As such, the types of land uses proposed by the Project will be consistent with the Regional Center Commercial land use designation.

Development in the Regional Center Commercial designation is limited to an FAR of 4.5:1. However, new development may exceed the 4.5:1 FAR limitation to a maximum of 6:1 FAR if the development meets specific objectives set forth in Section 506.2.3 of the Redevelopment Plan, or as allowed by future amendments to the Community Plan. Specifically, Section 506.2.3 permits the increased FAR provided that the proposed development further the goals and intent of this Plan and the Community Plan and meets objective "a" below and at least one of the other objectives:

- a) to concentrate high intensity and/or density development in areas with reasonable proximity or direct access to high capacity transportation facilities or which effectively utilize transportation demand management programs;
- b) to provide for new development which compliments [sic] the existing buildings in areas having architecturally and/or historically significant structures or to encourage appropriate development in areas that do not have architecturally and/or historically significant buildings;
- c) to provide focal points of entertainment, tourist or pedestrian oriented uses in order to create a quality urban environment;
- d) to encourage the development of appropriately designed housing to provide a balance in the community;

- e) to provide for substantial, well designed, public open space in the Project area; and
- f) to provide social services or facilities for social services which address the community's needs.

The Project meets Objectives (a), (c), (d) and (e) and, therefore, is consistent with Section 506.2.3 of the Redevelopment Plan. Specifically, the Project is located within 1,000 feet southeast of the Metro Red Line Hollywood/Highland Station and along major transit lines along Highland Avenue, Sunset Boulevard, and Hollywood Boulevard to meet Objective (a). Furthermore, the Project's proximity to Hollywood Boulevard and Sunset Boulevard will provide Project residents and tourists convenient access to entertainment uses along these two commercial corridors and encourage and promote walkability in the surrounding pedestrian-friendly environment to meet Objective (c). Under the Project, Development Parcel D will include 76 residential units to meet Objective (d). The Project will also include substantial, well-designed public open space to meet Objective (e).

The FAR averaged across the Project Site is 3.81:1. By meeting the objectives identified above and with the approved zone and height district change to replace the "D" Limitation to reflect the Project, the Project is consistent with the allowable FAR for the Regional Center Commercial land use designation on these parcels.

The Project is consistent with the goals set forth in the Redevelopment Plan. The Project meets the needs of the residential, commercial, arts, and entertainment sectors. In addition, the Project provides new housing opportunities, including affordable housing units, and office, hotel, entertainment and commercial/retail uses. The Project promotes the development of sound residential neighborhoods through mechanisms, such as land use, density and design standards, public improvements, property rehabilitation, sensitive in-fill housing, development of open spaces and other support services necessary to enable residents to live and work in Hollywood. Although the Project results in significant and unavoidable impacts at five study intersections, the Project supports and encourages a circulation system that will improve the quality of life in Hollywood, including pedestrian, automobile, parking, and mass transit systems, by concentrating new development within 1,000 feet of the Metro Red Line Hollywood/Highland Station and other transit stops along Hollywood Boulevard, Highland Avenue, and Sunset Boulevard to reduce vehicle miles traveled by Project residents.

Based on the analysis above, the Project is consistent with the Hollywood Redevelopment Plan.

(c) Los Angeles Municipal Code (LAMC)

The Project consists of eight mixed-use buildings with heights ranging from 2 to 32 stories (i.e., 42 feet to approximately 402 feet above grade) and a small stand-alone one-story commercial/retail-only building (up to 19 feet in height). The Project Site is currently designated as Regional Center Commercial and zoned C4-2D (Commercial, Height District 2 with Development Limitation) and C4-2D-SN (Commercial, Height District 2 with Development Limitation, Signage Supplemental Use District) by the LAMC. The Commercial zones allow for a wide array of land uses, such as retail stores, restaurants, offices, hotels, schools, parks, and theaters. With some limitations (as

identified in the LAMC), the C4 zone allows for any land use permitted in the C2 zone, which, in turn, allows for any land use permitted in the C1.5, C1, and CR zones. The C4 zone also allows for any land use permitted in the R4 (Multiple Residential) zone, which includes one-family dwellings, two-family dwellings, apartment houses, multiple dwellings, and home occupations at a maximum density of 108 dwelling units per acre. In addition, pursuant to LAMC Section 12.22-A,18(a), developments combining residential and commercial uses are also allowed to develop any land use permitted in the R5 zone, which allows density for a maximum density of 217 dwelling units per acre based on a minimum lot area of 200 square feet per dwelling unit.

Height District 2 within the C4 zone does not impose a height limitation and has a maximum FAR of 6:1. However, the Development "D" Limitation in the zoning prefix indicates that development shall not exceed a FAR of 2:1 and 3:1 unless certain approvals are received. The Project will include approximately 1,381,000 square feet of developed floor area (including existing uses to be retained) with a total FAR of approximately 3.81:1 averaged across the Project Site. Thus, the Project will be developed within the allowable density of the underlying zone but, because of the Development "D" Limitation, will exceed the FAR specified for the C4-2D and C4-2D-SN zones. However, with approval of the requested discretionary actions, including a zone change to replace the "D" Limitation to reflect the Project, the Project will comply with the requirements of the LAMC.

Under the existing C4-2D and C4-2D-SN zoning, the Project is not required by the LAMC to provide front, rear, or side yard setbacks. Thus, proposed setbacks will be consistent with surrounding buildings and will be consistent with the LAMC.

As discussed in Section IV.L, Traffic, Access, and Parking, of the Draft EIR, based on the parking requirements set forth in Sections 12.21-A,4 and 12.22-A,25 of the LAMC, the Project requires a total of 2,186 parking spaces. The Project provides a total of 2,258 parking spaces. Therefore, the Project includes parking that exceeds the minimum applicable parking requirements of the LAMC. In addition, in accordance with Section 12.21-A,16(a) of the LAMC, the Project is required to provide 1,239 bicycle parking spaces. The Project provides the required number of spaces, including 1,048 long-term spaces and 193 short-term spaces, to comply with the bicycle parking requirements of the LAMC.

The Project also meets the requirements set forth in Section 12.21 of the LAMC concerning the provision of on-Site open space. The Project provides approximately 101,075 square feet of open space, consisting of approximately 22,200 square feet of interior amenity space, 51,225 square feet of common open space, and approximately 27,650 square feet of private open space (i.e., balconies), in accordance with the open space provisions for new residential projects set forth in LAMC Section 12.21-G. Furthermore, the existing Crossroads of the World courtyards and the continuation of the plaza between Buildings C1 and C2 will provide an additional 41,800 square feet of open space, as well as approximately 23,500 square feet of additional pedestrian paseo. When including the proposed pedestrian paseo and the existing courtyards that are accessible to both the Project residents and the general public, the open space provided within the Project Site will total approximately 166,375 square feet.

In accordance with the LAMC Section 12.24-W.1, the Project is seeking a Master Conditional Use a to permit the on-Site and off-Site sale, dispensing and consumption of

a full line of alcoholic beverages in connection with a total of 22 establishments associated with the Project's proposed hotel and commercial uses. The service and sale of alcoholic beverages will be incidental to the commercial and restaurant operations. Several restaurant/bar and entertainment uses with permits to serve alcohol are already located near the Project Site

In summary, with approval of the requested discretionary actions, the Project shall be consistent with all applicable provisions of the LAMC.

(d) Hollywood Signage Supplemental Use District

The parcels along the western boundary of the Project Site fronting Highland Avenue in Development Parcel A and the parcels along the southern boundary of the Project Site fronting Sunset Boulevard in Development Parcel B are located within the boundaries of the Hollywood Signage Supplemental Use District (HSSUD). These parcels do not include any of the types of signs that are prohibited in the HSSUD, including, but not limited to billboards, can signs, captive balloon signs, high rise signs, illuminated architectural canopy signs, pole signs, sandwich board signs, and solid panel roof signs, pursuant to Ordinance No. 181,340. Furthermore, development of the Project in these parcels complies with the design standards for specific types of signs set forth in Ordinance No. 181,340, including, but not limited to, standards related to location, dimensions, area, height, spacing, and materials, for each of the types of signs. Signage includes monument or mounted Project identity signage, building and commercial tenant signage, and general ground-level and wayfinding pedestrian signage, as permitted by the HSSUD. Wayfinding signs are located at parking garage entrances, elevator lobbies, vestibules, and residential corridors. Illuminated signage includes identification signs, digital message boards, and tenant retail signs. Therefore, the Project is consistent with the applicable signage requirements in the HSSUD.

Consistency with Regional Plans

The Southern California Association of Governments (SCAG) is mandated to create the regional plans that address transportation, growth management, hazardous waste management, and air quality. SCAG prepares several plans including the Regional Comprehensive Plan/Sustainable Communities Strategy (RTP/SCS), the Regional Comprehensive Plan (RCP) and the Compass Growth Vision Report.

As detailed in Section IV.H, Land Use, of the Draft EIR, the Project is consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS, the Compass Growth Vision Report, and the RCP. Given the Project's location in proximity to a variety of transportation options, the Project maximizes mobility and accessibility by providing a mixed-use development that will take advantage of these opportunities for use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking. Furthermore, the Project is located along Sunset Boulevard and two blocks south of Hollywood Boulevard, two commercial corridors that are characterized by a high degree of pedestrian activity and "people-scaled" uses, consistent with the vision of the RCP. The Project also includes a pedestrian paseo, which feature areas (e.g., interactive water features, seating, planting, fire places, and/or movie screens), and include the revitalized historic Crossroads of the World complex. Therefore, by focusing new housing opportunities and mixed-use development that

contribute to a walkable and "people-scaled" community in a High-Quality Transit Area (HQTA) and a Transit Priority Area (TPA), the Project is consistent with primary goals of the applicable regional plans identified above.

Conclusion Regarding Impacts Relative to Land Use Consistency

Based on the analysis provided above, the Project is substantially consistent with the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site. Therefore, the Project is substantially consistent with the General Plan, Community Plan, Redevelopment Plan, or the whole of relevant environmental policies in other applicable plans, including regional plans. As such, impacts related to land use consistency are less than significant.

4. Land Use Compatibility

The Project proposes a mix of residential, hotel, office, entertainment and commercial/retail uses that will be compatible with the surrounding area and will complement existing and future development in the Project area and within the Hollywood community. As shown by the number and type of related projects listed in Section III, Environmental Setting, of the Draft EIR, the Hollywood Community Plan continues to transform this portion of the city into a pedestrian-oriented community as demonstrated by the mixed-use developments, new residential, hotel, office, and commercial/retail uses. Similar to the Project, many of the recent developments provide new multi-family residential units with ground-floor commercial and retail amenities in addition to new offices and hotel uses. Thus, the Project represents a continuation of those types of projects and a reflection of the surrounding urban environment.

In addition, despite its increased density, scale, and height of development over existing uses at the Project Site, the Project is consistent with the character of the surrounding area, which is highly urbanized and contains a varied mix of land uses at various scales of development, including low- to high-rise buildings occupied by neighborhood-serving commercial/retail uses, tourist and entertainment-related commercial/retail uses, offices, hotels, educational institutions, and single-family and multi-family residences. In the immediate vicinity of the Project Site are the Blessed Sacrament Church and School, the First Baptist Church, a plant nursery, commercial/retail strip malls, a Rite-Aid pharmacy, a Panavision office, multi-family apartment buildings, Hollywood High School, Selma Avenue Elementary School and its co-located Larchmont Charter School West, the Los Angeles Recording School, a multi-story office building, and surface parking lots. On the southern boundary of the Project Site, fronting Sunset Boulevard, are a mix of commercial/retail and restaurant uses, entertainment-related uses, and nightclubs. The Hollywood & Highland Center and entertainment complex is located approximately 1,000 feet northwest of the Project Site at the corner of Hollywood Boulevard and Highland Avenue.

The Project does not create any division of land or divide an established community. The Project improves and enhances the existing streetscape in the Project area to promote pedestrian activity within a regional center, particularly between the Metro Red Line Hollywood/Highland Station and the Hollywood & Highland Center and the Project Site. The Project itself is linked by a pedestrian paseo that meanders through the Project Site from the hotel at the northwestern portion of the Project Site to the historic Crossroads of

the World along the eastern end of the Project Site to promote and enhance pedestrian activity. Additional landscaped public walkways connect the entire Project Site, while promoting access from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place.

Based on the analysis above, the Project does not substantially or adversely change the existing land use relationships between the Project Site and existing off-Site uses, or have a long-term effect of adversely altering a neighborhood or community through on-going disruption, division, or isolation of these uses. Impacts related to land use compatibility are less than significant.

5. Cumulative Impacts

As indicated in Section III, Environmental Setting, of the Draft EIR, there are 145 related projects in the vicinity of the Project Site. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, commercial, office, hotel, institution, and motion picture uses. Specifically, the related projects located within Project Site vicinity are shown in Figure III-1 in Section III, Environmental Setting, of the Draft EIR. The proposed developments comprise a variety of uses, including apartments, condominiums, office, restaurants, and retail uses, as well as mixed-use developments that incorporate some or all of these elements. The nearest proposed development projects located within a 0.25-mile radius of the Project Site include Related Project Nos. 17, 30, 37, 39, 45, 50, 65, 80, 94, 134, 137, and 139, which involve development of mixed-use, commercial retail, residential uses, office, and hotels. As with the Project, the related projects will be required to comply with relevant land use policies and regulations. Such related projects are also not expected to fundamentally alter the existing land use relationships in the community but, rather, will concentrate development on particular sites and promote a synergy between existing and new uses and overall connectivity of the Hollywood community. Therefore, the Project and the related projects do not have cumulatively significant land use impacts. The balance of the related projects will not cause cumulative land use impacts due to their similar characteristics (i.e., mixed-use residential and commercial projects) and because of their distance from the Project Site buffered by existing intervening development. Finally, the Project itself is consistent with applicable land use plans and zoning standards. Based on the mix of uses and buildings that currently comprise the Hollywood community, as well as the proposed uses, as detailed in Table III-1 in Section III, Environmental Setting, of the Draft EIR, the Project is compatible with the uses of various existing and proposed developments in the immediate vicinity of the Project Site, as well as with the existing and proposed uses planned throughout the surrounding vicinity. Therefore, cumulative land use impacts are less than significant.

Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts regarding the Project's consistency with applicable local and regional land use plans and policies.

I. **Noise**

1. Construction Vibration – Building Damage Impacts from Off-Site Construction

Construction delivery/haul trucks will travel between the Project Site and the Hollywood Freeway via one or more of the following routes: Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard. Heavy-duty construction trucks will generate ground-borne vibration as they travel along the Project's anticipated haul route(s). Thus, an analysis of potential vibration impacts using the building damage and human annoyance thresholds for ground-borne vibration along the anticipated local haul routes was conducted.

Based on Federal Transit Administration (FTA) data, the vibration generated by a typical heavy-duty truck is approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck. According to the FTA "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Nonetheless, there are existing buildings along the Project's anticipated haul route(s) that are situated approximately 20 feet from the right-of-way and will be exposed to ground-borne vibration levels of approximately 0.022 PPV, as provided in the noise calculation worksheets included in Appendix I of the Draft EIR. This estimated vibration generated by construction trucks traveling along the anticipated haul route(s) will be below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, vibration impacts (pursuant to the threshold of significance for building damage) from off-Site construction activities (i.e., construction trucks traveling on public roadways) will be less than significant.

2. Operational Noise

(a) On-Site Stationary Noise Sources

(1) Mechanical Equipment

As part of the Project, new rooftop mechanical equipment (i.e., HVAC condenser units) will be located at the roof level. Although operation of this equipment generates noise, regulatory compliance ensures that all on-Site mechanical equipment comply with the regulations under Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, as required by Project Design Feature NOI-PDF-3, all outdoor mounted mechanical equipment will be enclosed or screened from off-Site noise-sensitive receptors. The estimated noise levels from the Project's mechanical equipment will range from 43.0 dBA (L_{eq}) at receptor location R11 to 56.0 dBA (L_{eq}) at receptor location R10, which will result in a maximum increase of 3.8 dBA (L_{eq}) at receptor location R4. Accordingly, the estimated noise levels at all off-Site receptor locations will be below the significance thresholds of 3 dBA (L_{eq}) above ambient noise levels applicable to the LAUSD schools at receptors R11 and R16, and 5 dBA (L_{eq}) above ambient noise levels applicable to the remaining receptors. Therefore, noise impacts from mechanical equipment are less than significant.

(2) Loading Dock/Trash Collection Areas

As discussed in Section II, Project Description, of this Draft EIR, the Project is serviced through three loading areas. Noise sources associated with the loading dock and trash collection area include delivery/trash collection trucks and trash compactor operation. Based on measured noise levels from typical loading dock facilities and trash compactors,

delivery/trash collection trucks and trash compactors could generate noise levels of approximately 71 dBA (L_{eq}) and 66 dBA (L_{eq}), respectively, at a distance of 50 feet. As set forth in Project Design Feature AES-PDF-6 in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of the Draft EIR, trash collector areas will be fully enclosed during Project operation. Since the loading dock and trash collection area will be fully enclosed, noise generated within the loading dock and trash collection area are shielded from the off-Site sensitive receptors. The estimated noise from the loading dock and trash compactor range from 19.5 dBA (L_{eq}) at receptor location R16 to 46.4 dBA (L_{eq}) at receptor location R10. The estimated noise levels from the loading dock and trash compactor at all off-Site receptor locations are below the significance thresholds of 3 dBA (L_{eq}) applicable to receptors R11 and R16 and 5 dBA (L_{eq}) applicable to the remaining receptors. Therefore, noise impacts from loading dock and trash compactor operations are less than significant.

(b) Off-Site Traffic (Mobile Sources)

(1) Future plus Project

For the Draft EIR, future roadway noise levels were calculated along 83 roadway segments in the vicinity of the Project Site. The roadway noise levels were calculated using the traffic data provided in the Traffic Study prepared for the Draft EIR, which is included in Appendix O of the Draft EIR. As the Project was then expected to generate a net increase of 15,005 daily weekday trips, Project -related traffic was expected to increase the existing traffic volumes along the roadway segments in the study area when compared with Future Without Project conditions. This increase in roadway traffic was analyzed to determine if any traffic-related noise impacts will result from operation of the Project.

The calculated Community Noise Equivalent Levels (CNEL), which is used by the City and State to describe noise impacts, are conservatively calculated along the roadways and do not account for the presence of any physical sound barriers or intervening structures. The Project will have resulted in an increase of up to 2.6 dBA (CNEL) in traffic-related noise levels along McCadden Place between Selma Avenue and Sunset Boulevard. At all other analyzed roadway segments, the increase in traffic-related noise levels will have been 2.2 dBA or lower. The increase in traffic noise levels will have been below the 3-dBA CNEL significance threshold increase at the property line of affected noise-sensitive uses and along roadway segments with LAUSD schools (i.e., Highland Avenue between Hollywood Boulevard and Sunset Boulevard, Las Palmas Avenue between Santa Monica Boulevard and Melrose Avenue, Vine Street between Santa Monica Boulevard and Melrose Avenue, Bronson Avenue between Sunset Boulevard and Santa Monica Boulevard, Franklin Avenue between Cahuenga Boulevard and Western Avenue, Sunset Boulevard between La Brea Avenue and Western Avenue, and Selma Avenue between Las Palmas Avenue and Wilcox Avenue). Therefore, traffic noise impacts under Future Plus Project conditions as analyzed in the Draft EIR will have been less than significant.

Once modified as described in the Final EIR, however, the Project results in a reduction in daily trips compared to the analysis prepared for the Draft EIR. Consequently, noise impacts associated with off-Site traffic are less than significant, and less than the impacts identified in the Draft EIR.

(2) Existing plus Project

The analysis of off-Site traffic noise impacts above was based on the incremental increase in traffic noise levels attributable to Future with Project conditions as compared to Future without the Project conditions. Additional analysis was made to determine the potential noise impacts based on the increase in noise levels due to Project-related traffic compared with the existing baseline traffic noise conditions.

When compared with existing conditions, the Project as analyzed in the Draft EIR will have resulted in a maximum 2.8 dBA (CNEL) increase in traffic noise along McCadden Place between Selma Avenue and Sunset Boulevard. At all other analyzed roadway segments, the increase in traffic-related noise levels will have been 2.4 dBA or lower. In addition, the Existing Plus Project traffic noise analysis done for the Draft EIR was conservative, as baseline ambient mobile noise levels are expected to increase by the time the Project is completed (i.e., the traffic volumes and associated noise in 2022, which is the Project's buildout year, will increase without the Project due to ambient growth, as well as other related projects that will be completed by that year). Nevertheless, the estimated increase in traffic noise levels as compared to existing conditions will have been below the 3-dBA CNEL significance threshold increase at the property line of affected noise-sensitive uses to or within the "normally unacceptable" or "clearly unacceptable land use category and along roadway segments with LAUSD schools (i.e., Highland Avenue between Hollywood Boulevard and Sunset Boulevard, Las Palmas Avenue between Santa Monica Boulevard and Melrose Avenue, Vine Street between Santa Monica Boulevard and Melrose Avenue, Bronson Avenue between Sunset Boulevard and Santa Monica Boulevard, Sunset Boulevard between La Brea Avenue and Western Avenue, and Selma Avenue between Las Palmas Avenue and Wilcox Avenue). Therefore, traffic noise impacts under Existing Plus Project conditions as analyzed in the Draft EIR will have been less than significant.

Once modified as described in the Final EIR, however, the Project results in a reduction in daily trips compared to the analysis prepared for the Draft EIR. Consequently, noise impacts associated with off-Site traffic are less than significant, and less than the impacts identified in the Draft EIR.

3. Cumulative Impacts

(a) Construction

(1) Building Damage due to On-Site Vibration

As ground-borne vibration decreases rapidly with distance, potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in proximity to the construction Site (i.e., within 20 feet as related to building damage and 80 feet as related to human annoyance at residential uses). With Related Project No. 45 immediately north of and nearest to the Project Site, the use of heavy construction equipment will be a minimum of 55 feet between the Project Site and the Related Project No. 45. Due to the rapid attenuation characteristics of ground-borne vibration and given the distance of the nearest related Project to the Project Site, there is no potential for a cumulative construction vibration impact with respect to building damage associated with ground-borne vibration from on-Site sources.

(2) Building Damage Due to Off-Site Vibration

Based on Federal Transit Administration (FTA) data, the vibration generated by a typical heavy truck will be approximately 63 VdB (0.00566 PPV) at a distance of 50 feet from the truck. According to the FTA, "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." Existing buildings that are approximately 20 feet from the right-of-way of the Project's anticipated haul route(s) (i.e., Sunset Boulevard, Highland Avenue, and Santa Monica Boulevard) are anticipated to be exposed to ground-borne vibration levels of approximately 0.022 PPV. Trucks from the related projects are expected to generate similar ground-borne vibration levels. Therefore, the vibration levels generated from off-Site construction trucks associated with the Project and other related projects along the anticipated haul route(s) will be well below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, potential cumulative vibration impacts with respect to building damage from off-Site construction will be less than significant.

(b) Operational Noise

The Project Site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from a number of community noise sources, including vehicle travel, mechanical equipment (e.g., HVAC systems), outdoor activity areas, and intermittent landscaping maintenance activities. Each of the related projects that have been identified within the general Project Site vicinity also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. All related projects are of a residential, retail, commercial, or institutional nature, and these uses are not typically associated with excessive exterior noise levels. However, each Project produces traffic volumes that are capable of generating roadway noise impacts.

(1) On-Site Stationary Noise Sources

Due to provisions set forth in the LAMC that limit stationary source noise from items such as rooftop mechanical equipment, noise levels must be less than significant at the property line for each related Project. In addition, with regulatory compliance and implementation of the Project's Project Design Features, noise impacts associated with operations within the Project Site are less than significant. With regulatory compliance and based on the distance of the related projects from the Project Site and the noise levels associated with the Project after implementation of the Project Design Features, cumulative stationary source noise impacts associated with operation of the Project and related projects are less than significant.

(2) Off-Site Mobile Noise Sources

The Project and related projects in the area will produce traffic volumes (off-Site mobile sources) that will generate roadway noise. Cumulative noise impacts due to off-Site traffic were analyzed in the Draft EIR by comparing the projected increase in traffic noise levels

from "Existing" conditions to "Future Plus Project" conditions to the applicable significance criteria. Future Plus Project conditions include traffic volumes from future ambient growth, related projects, and the Project. As shown therein, cumulative traffic volumes will result in a maximum increase of 2.9 dBA (CNEL) along the roadway segment of McCadden Place between Selma Avenue and Sunset Boulevard, which will be below the 5 dBA significance threshold (applicable when noise levels fall within the conditionally acceptable category). At all other analyzed roadway segments, the increase in cumulative traffic noise will be less than 2.9 dBA (CNEL). Therefore, cumulative noise impacts due to off-Site mobile noise sources associated with the Project, future growth, and related projects will be less than significant. Moreover, as described in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, the Project modifications made since the analysis in the Draft EIR have reduced the Project's traffic. Therefore, the Project's contribution to cumulative traffic noise are even less than reported in the Draft EIR.

1. **Project Design Features:**

The City finds that Project Design Features NOI-PDF-2, NOI-PDF-3 and NOI-PDF-4 and AES-PDF-6, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, reduce the potential construction vibration operational noise impacts of the Project. These Project Design Features were taken into account in the analysis of potential impacts.

J.1. Employment

1. Construction-Related Employment Impacts

Project development will generate the employment of construction workers on-Site during the demolition, grading and excavation, and building construction and finishing phases. However, individual construction projects generally do not generate new employment within the region. Rather, there is a pool of construction workers who move from Project to Project as work is available. The Project, therefore, supports the regional pool of construction workers and also contributes additional indirect jobs in a wide range of industries throughout the region resulting from the purchase of construction-related supplies, goods and services, and household expenditures by direct and indirect employees. Overall, since construction employment related to the Project shall be temporary and shall not exceed expected growth, construction-related employment impacts shall be less than significant.

2. Operational Employment Impacts

The employment impacts of the Project are based on the number of direct jobs that are associated with the Project's new commercial and office uses, which are calculated using current LAUSD employment generation rates for comparable land uses. The projected scale of Project employment is then compared with applicable local and regional employment growth forecasts, including the jobs/housing ratio. In addition, the scale and character of Project employment is compared with applicable local and regional economic development and employment policies.

(a) **Direct Project Employment Impacts**

As shown in Table III-6 on page III-72 of the Revisions, Clarifications, and Corrections to the Draft EIR, based on LAUSD employment generation rates, development of the Project will result in approximately 955 employment positions on the Project Site. When accounting for the removal of existing uses, the Project creates a net increase of approximately 502 on-Site jobs.

(b) Project Employment Consistency With SCAG's Adopted Employment Growth Forecast

The Southern California Association of Governments (SCAG) is the federally designated Metropolitan Planning Organization for six Southern California counties (Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles). It is responsible for developing plans for transportation, growth management, and hazardous waste management, and a regional growth forecast that is a foundation for these plans. SCAG's 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS) provides growth forecasts for the City of Los Angeles and the SCAG Region. The forecast projects a total of 8,550,933 jobs within the SCAG Region in 2022, which amounts to 418,600 jobs (5.15 percent) being added to the SCAG Region between 2015 and 2022. In April 2016, SCAG adopted the 2016–2040 RTP/SCS; as a point of comparison, the growth forecasts in this document Project a total of 8,528,480 jobs within the SCAG Region in 2022, which amounts to 522,480 jobs (6.53 percent) being added to the SCAG Region between 2015 and 2022.

The 502 net new employees generated under the Project account for only a small portion (approximately 1.09 percent) of the employment forecasted for 2022 and the employment growth forecasted between 2015 and 2022 in the City of Los Angeles, as well as the SCAG Region (approximately 0.12 percent). Therefore, Project-related employment generation is within and, thus, consistent with SCAG's employment forecasts for the SCAG Region and the City of Los Angeles.

(c) Jobs/Housing Ratio

When the jobs/housing ratio occurs equally throughout the region, the opportunity is the greatest for people to live close to where they work, thus reducing vehicle miles traveled. Based on SCAG's 2012–2035 RTP/SCS projections, there will be approximately 8,550,933 employees in the SCAG Region and 1,829,580 employees in the City of Los Angeles in 2022. The household data presented in Table IV.J.2-3 in Section VI.J.2, Housing, of the Draft EIR, show 6,573,600 households in the SCAG Region and 1,478,487 households in the City of Los Angeles in 2022. Therefore, based on SCAG's 2012–2035 RTP/SCS, the 2022 jobs/housing ratios for the SCAG Region and the City of Los Angeles are 1.30 jobs per household and 1.24 jobs per household, respectively. Based on SCAG's 2016–2040 RTP/SCS projections, there will be approximately 8,528,480 employees in the SCAG Region and 1,865,221 employees in the City of Los Angeles in 2022. The household data presented in Table IV.J.2-3 in Section VI.J.2, Housing, of the Draft EIR, show 6,357,200 households in the SCAG Region and 1,455,786 households in the City of Los Angeles in 2022. Therefore, based on SCAG's 2016–2040 RTP/SCS, the 2022 jobs/housing ratios for the SCAG Region and the City of Los Angeles are 1.34 jobs per household and 1.28 jobs per household, respectively. For the SCAG Region, the jobs/housing ratio is forecast to slightly improve from 1.31 in 2015 to 1.30 in 2022 based on SCAG's 2012–2035 RTP/SCS and from 1.35 in 2015 to 1.34 in

2022 based on SCAG's 2016–2040 RTP/SCS. For the City of Los Angeles, the jobs/housing ratio is forecast to slightly improve from 1.28 in 2015 to 1.24 by 2022 based on SCAG's 2012–2035 RTP/SCS; however, the jobs/housing ratio is forecast to be the same (i.e., 1.28) in 2015 and 2022 based on SCAG's 2016–2040 RTP/SCS. Since the Project represents only a small percent of the 2022 employment positions for the SCAG Region and the City of Los Angeles, impacts on the jobs/housing ratio shall be less than significant.

Based on the above, the Project does not cause growth (i.e., new employment) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project buildout. In addition, since the Project develops a mix of residential, commercial, and office uses, it provides opportunities for jobs and housing to co-exist on-Site. Therefore, impacts related to employment consistency with SCAG's forecast for the SCAG region and the City of Los Angeles are less than significant, and no mitigation measures are required.

3. Consistency with Adopted Plans and Policies

In addition to Project consistency with City of Los Angeles employment growth forecasts, the Project is also consistent with City and SCAG economic development and employment policies.

(a) Consistency With the Los Angeles General Plan Framework Element

As described in Table IV.H-2 of the Draft EIR, the Project: (1) concentrates growth in one of the City's most urbanized areas; (2) supports the creation of new jobs; (3) includes a mix of diverse uses including commercial/retail, entertainment, and residential uses, all in the same development (i.e., mixed-use); (4) provides on-Site retail, consisting of additional restaurant space, alongside other convenience goods retailers; and (5) encourages bicycle and pedestrian activity. Thus, the Project is consistent with the applicable policies relevant to employment in the General Plan Framework Element.

(b) Consistency With the Hollywood Community Plan

As described in Table IV.H-4 on page IV.H-59 of the Draft EIR, the Project: (1) creates a variety of employment opportunities for City residents; (2) provides housing for a range of economic segments of the community; and (3) accommodates the shopping needs of the Project's residents, employees, and guests. Therefore, the Project is consistent with the applicable commercial land use goals, policies, and objectives relevant to employment in the Hollywood Community Plan.

(c) SCAG's Compass Growth Vision

SCAG prepares several plans to address regional growth, including the Southern California Compass Growth Vision that presents a comprehensive growth vision for the six-county SCAG region. The fundamental goal of the Compass Growth Vision is to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income class. It shall be consistent with the relevant employment-related policies of the Growth Vision Report. Specifically, the Project places jobs in an area that is easily accessible by public transit. The Project's mix of uses and proposed density are

consistent with the land use and growth patterns envisioned in SCAG's Compass Growth Vision. Specifically, as discussed in Table IV.H-6 on page IV.H-70 of Section IV.H, Land Use, of the Draft EIR, the Project creates an open-air pedestrian-oriented infill development with a mix of shopping, housing, dining and entertainment uses that serves residents and revitalizes the existing surrounding communities. Therefore, the Project is consistent with the principles of the Growth Vision related to locating new housing near existing jobs and new jobs near existing housing and promotes development that provides a mix of uses.

(d) Other Growth Inducement Issues

While the Project's addition of new employment is consistent with regional employment forecasts, it does not, in and of itself, foster new growth in the area by removing impediments to growth. As described in Section IV.H, Land Use, of the Draft EIR, the area surrounding the Project Site is already developed with a mix of commercial, office, and residential uses. All roadway improvements planned for the Project are tailored to improve circulation flows and safety throughout the area, consistent with the Project's impacts and objectives. Utility and other infrastructure upgrades are intended primarily to meet Project-related demand. The Project employees' demand for convenient commercial goods and services will be met by new retail, service, and other resources included as part of the Project or already located within close proximity to the Project Site. No new development specifically to meet the Project's scale of commercial demand is needed.

4. Conclusion

The Project is consistent with applicable employment growth plans and policies of SCAG and the City. The Project: (1) concentrates growth in one of the City's most urbanized areas, proximate to numerous regional and local transit lines; (2) supports the creation of new jobs; and (3) includes a mix of commercial/retail, entertainment, and residential uses, all in the same development, thereby advancing the goal of providing mixed-use facilities within the urbanized areas of the City of Los Angeles.

The Project results in a substantial number of net new jobs and economic activity. The additional 502 jobs associated with the Project are within SCAG's employment growth forecast for the SCAG region and the City of Los Angeles from 2015 to 2022. As such, Project impacts with respect to employment are less than significant.

5. Cumulative Impacts

As identified in Section III, Environmental Setting, of the Draft EIR, 145 related projects in the surrounding area are expected to be constructed and/or operational during the same time period as the Project. These related projects will generate approximately 37,195 jobs in the City of Los Angeles and 2,446 jobs in the City of West Hollywood. Based on forecasts in 2012-2035 RTP/SCS: (1) the Project's cumulative employment for the SCAG Region (i.e., total Project employment plus "related projects" employment for the City of Los Angeles and the City of West Hollywood) accounts for about 0.48 percent of the employment forecasted in the SCAG Region in 2022 and approximately 9.71 percent of the forecasted growth in employment between 2015 and 2022; (2) the Project's cumulative employment for City of Los Angeles (i.e., total Project employment

plus "related projects" population for the City of Los Angeles) represents approximately 2.09 percent of 2022 employment in the City of Los Angeles; and 3) the cumulative employment impact accounts for approximately 82.58 percent of the 2015–2022 employment growth forecast in the City of Los Angeles. However, of the 82.58 percent, the Project's incremental contribution is only approximately 2.16 percent. Therefore, the Project's incremental employment impact is not "cumulatively considerable" per CEQA, and, as such, its cumulative employment impact is less than significant.

1. Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts regarding employment related to the Project.

J.2. Housing

1. Construction-Related Housing Impacts

Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are unlikely, to any notable degree, to relocate their households as a consequence of the construction job opportunities presented by the Project. The construction industry differs from most other industry sectors in several important ways that are relevant to potential impacts on housing: There is no regular place of work. Construction workers commute to job sites that change many times in the course of a year. These often lengthy daily commutes are made possible by the off-peak starting and ending times of the typical construction work day. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job Site to job Site as dictated by the demand for their skills. The work requirements of most construction projects are also highly specialized and workers are employed on a job Site only as long as their skills are needed to complete a particular phase of the construction process.

Therefore, based on these factors, it is unlikely that Project-related construction workers will relocate their households' places of residence as a direct consequence of working on the Project. Thus, there are no significant housing impacts on household growth in the City of Los Angeles due to Project construction. Accordingly, construction-related impacts related to housing are less than significant.

2. Operational Housing Impacts

(a) Direct Project Housing Impacts

The Project removes the existing 82 dwelling units on-Site and constructs 950 rental apartments, including 105 affordable units. Therefore, implementation of the Project results in a net increase of 868 housing units on-Site.

SCAG prepares several plans to address regional growth, including the Regional Comprehensive Plan/Sustainable Communities Strategy (RTP/SCS), which is a long-range visioning plan that considers transportation and housing needs with economic, environmental and public health goals. In comparison with applicable regional and local housing growth forecasts from SCAG, the Project's residential units represent approximately 0.23 percent and 0.21 percent of SCAG's forecasted housing growth for

the SCAG Region between 2015 and 2022, based on 2012–2035 RTP/SCS and 2016–2040 RTP/SCS, respectively. Further, the Project's residential units represent approximately 1.04 percent and 0.95 percent of SCAG's forecasted housing growth for the City of Los Angeles between 2015 and 2022, based on 2012–2035 RTP/SCS and 2016–2040 RTP/SCS, respectively.

As stated in many adopted regional and local planning documents, including the 2014–2021 Housing Element, the City remains in need of new dwelling units to serve both current and projected populations. While the Project does not eliminate the housing shortage in the City, it incrementally advances the City's goal of generating more housing for the region.

In addition to 950 new dwelling units, the Project includes a 308-room hotel, approximately 190,000 square feet of commercial/retail and entertainment uses. The retail, hotel, and entertainment uses include a range of permanent and part-time positions that are typically filled by persons already residing in the vicinity of the workplace and who generally do not relocate their households due to such employment opportunities. Any indirect demand for housing will be fulfilled by a combination of the Project's 950 dwelling units, vacancies in the surrounding housing market, and from other new units in the vicinity of the Project.

Based on the above analysis, the Project does not cause housing growth to exceed projected/planned levels for the Project's buildout year. As such, development of the Project does not result in an adverse physical change in the environment. Accordingly, impacts relating to housing growth are less than significant, and no mitigation measures are required.

3. Cumulative Impacts

As noted above, the Project generates 868 net new housing units. The related projects will generate approximately 14,950 housing units within the SCAG Region, of which 13,678 housing units will be within the City of Los Angeles. Based on forecasts in 2012–2035 RTP/SCS, (1) the Project's cumulative households for the SCAG Region (i.e., Project households plus "related projects" households for the City of Los Angeles and the City of West Hollywood, which is located to the southwest of the Project Site) accounts for approximately 0.23 percent of the households forecasted in the SCAG Region in 2022 and approximately 3.89 percent of the forecasted growth in households between 2015 and 2022; (2) the Project's cumulative households for City of Los Angeles (i.e., total Project households plus "related projects" households for the City of Los Angeles) represents approximately 0.93 percent of 2022 households in the City of Los Angeles; and (3) the cumulative households impact accounts for 16.37 percent of the 2015–2022 household growth forecast in the City of Los Angeles. However, of the 16.37 percent, the Project's incremental contribution is only about 1.04 percent. Therefore, the Project's incremental households impact is not cumulatively considerable per the CEQA Guidelines, and its cumulative household impact shall be less than significant.

1. Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts regarding housing related to the Project.

J.3. Population

1. Construction-Related Population Impacts

Due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely, to any notable degree, to relocate their households as a consequence of the construction job opportunities presented by the Project. The construction industry differs from most other industry sectors in several important ways that are relevant to potential impacts on population:

- There is no regular place of work. Construction workers commute to job sites that change many times in the course of a year. These often lengthy daily commutes are made possible by the off-peak starting and ending times of the typical construction work day.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job Site to job Site as dictated by the demand for their skills.
- The work requirements of most construction projects are also highly specialized and workers are employed on a job Site only as long as their skills are needed to complete a particular phase of the construction process.

Therefore, it is unlikely that Project-related construction workers will relocate their households' places of residence as a direct consequence of working on the Project. Thus, there will not be any significant population impacts related to household growth in the SCAG Region or the City of Los Angeles due to Project construction. Accordingly, construction-related impacts related to population are less than significant, and no mitigation measures are required.

2. Operational-Related Population Impacts

(a) Direct Project Population Impacts

The Project includes 868 net new multi-family residential units and, thus, introduces new residential population into the area. Based on a household size factor of 2.44 persons per household for multi-family housing units, the Project generates a net new residential population of 2,118 persons at full buildout.

The 868 net new housing units associated with the Project account for only 1.04 percent of the household growth forecasted by SCAG between 2015 and 2022 in the City of Los Angeles, and approximately 0.23 percent of the household growth in the SCAG Region during the same period. Further, the 2,118 persons associated with the Project account for only 1.55 percent of the population growth forecasted between 2015 and 2022 in the City of Los Angeles, and only 0.20 percent of the population growth in the SCAG Region during the same period. As such, the Project does not create substantial population

growth in an area by proposing new homes. Therefore, Project impacts related to population growth are less than significant, and no mitigation measures are required.

(b) Indirect Project Population Impacts

As discussed in Section IV.J.2, Housing, of the Draft EIR, jobs associated with the Project's commercial and retail uses will be filled to some extent by employees already residing in the vicinity of the Project. As such, the Project does not induce substantial population growth or exceed SCAG's population forecast for the City of Los Angeles or the SCAG Region.

As discussed in Section IV.J.1, Employment; Section IV.J.2, Housing; and Section IV.H, Land Use, of the Draft EIR, the Project is consistent with all applicable City and regional population policies, including jobs/housing balance, as set forth in the City's General Plan and SCAG's SCS/RTP and Compass Growth Vision. Therefore, the Project does not result in any significant adverse impacts in terms of compatibility with adopted local and regional population growth policies, as set forth in the City's General Plan and SCAG's SCS/RTP and Compass Growth Vision.

With regard to infrastructure, all circulation improvements planned for the Project are intended to improve circulation flows and safety throughout the affected area. Utility and other infrastructure upgrades planned for the Project are intended to meet Project-related demand. Therefore, the Project does not result in any significant adverse impacts in terms of the introduction of unplanned infrastructure that was not previously evaluated in the Community Plan and the General Plan.

Further, the Project Site is located in an area of Los Angeles that is already developed with single-family and multi-family homes, and commercial, residential, and industrial uses. Future growth is planned for and expected, pursuant to the Community Plan and other Elements of the City's General Plan. Therefore, the Project does not result in a substantial amount of growth and does not result in any significant adverse impacts in terms of this significance threshold. In conclusion, indirect impacts related to population are less than significant, and no mitigation measures are required.

3. Cumulative Impacts

A population growth of 2,118 persons is associated with the Project's residential uses. Table IV.J.3 5 on page IV.J.3-10 of the Draft EIR compares the Project's cumulative population impact and the forecasted population growth for the SCAG Region and Los Angeles between 2015 and 2022. The table shows, based on forecasts in 2012–2035 RTP/SCS, that: (1) the Project's cumulative population for the SCAG Region (i.e., total Project population plus "related projects" population for Los Angeles and West Hollywood, which is located to the southwest of the Project Site) accounts for approximately 0.18 percent of the population forecasted in the SCAG Region in 2022 and approximately 3.44 percent of the forecasted growth in population between 2015 and 2022; (2) the Project's cumulative population for Los Angeles (i.e., total Project population plus "related projects" population for Los Angeles) represents roughly 0.83 percent of the 2022 population in Los Angeles; and (3) the cumulative population impact accounts for approximately 24.54 percent of the 2015–2022 population growth forecast in Los Angeles. However, of the approximate 24.54 percent, the Project's incremental contribution is only approximately

1.55 percent. Therefore, the Project's incremental population impact is not "cumulatively considerable" under CEQA, and, as such, its cumulative population impact is less than significant.

Table IV.J.3-5 on page IV.J 3-10 of the Draft EIR also shows that, based on forecasts in 2016–2040 RTP/SCS: (1) the Project's cumulative population for the SCAG Region (i.e., total Project population plus "related projects" population for Los Angeles and West Hollywood, which is located to the southwest of the Project Site) accounts for approximately 0.18 percent of the population forecasted in the SCAG Region in 2022 and approximately 3.88 percent of the forecasted growth in population between 2015 and 2022; (2) the Project's cumulative population for Los Angeles (i.e., total Project population plus "related projects" population for Los Angeles) represents approximately 0.81 percent of 2022 population in Los Angeles; and (3) the cumulative population impact accounts for approximately 17.48 percent of the 2015–2022 population growth forecast in Los Angeles. However, of the 17.48 percent, the Project's incremental contribution is only approximately 1.11 percent. Therefore, the Project's incremental population impact is also not cumulatively considerable, and, as such, its cumulative population impact is less than significant.

As shown in Table IV.J.3-5 on page IV.J.3-10 of the Draft EIR, the Project's cumulative population share based on growth projections in the 2016–2040 RTP/SCS is slightly higher than the Project's cumulative population share based on growth projections in the 2012–2035 RTP/SCS for the SCAG Region; and the Project's cumulative population share based on growth projections in the 2016–2040 RTP/SCS is moderately lower than the Project's cumulative population share based on growth projections in the 2012–2035 RTP/SCS for Los Angeles. Nonetheless, in either case (i.e., 2012–2035 RTP/SCS or 2016–2040 RTP/SCS), Project impacts related to population growth are not cumulatively considerable and are less than significant. Therefore, no mitigation measures are required.

1. Project Design Features

The City finds that no specific Project Design Features are incorporated into the Project to reduce its potential impacts regarding population related to the Project.

K. Public Services and Recreation

1. Police Protection

(a) Construction

Pursuant to Project Design Feature PS-PDF-1, the Project applicant shall implement temporary security measures, including security fencing and barriers, lighting, locked entry and security patrols to secure the Project Site, during construction. With implementation of these measures, potential impacts associated with theft and vandalism during construction activities are less than significant.

Project construction activities could also potentially impact the surrounding roadways and Los Angeles Police Department (LAPD) protection services and police response times in the Project. As discussed in Section IV.L, Traffic, Access, and Parking, of the Draft EIR,

access to the Project Site and the surrounding vicinity could be impacted by Project-related construction activities, such as temporary lane closures, roadway/access improvements, utility line construction, and the generation of traffic as a result of construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Although construction activities are short-term and temporary for the area, Project construction activities could increase response time for police vehicles along Sunset Boulevard and Highland Avenue, in addition to other main connectors, due to travel time delays caused by traffic during the construction phase. However, as discussed in Section IV.J, Traffic, Access, and Parking, of the Draft EIR, most, if not all, of the construction worker and haul truck trips occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a construction management plan will be implemented during Project construction pursuant to Project Design Feature TRA-PDF-1 in Section IV.L, Traffic, Access, and Parking of the Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. Features of the construction management plan will be developed in consultation with LADOT and may include limiting potential lane closures to off-peak travel periods, to the extent feasible, and scheduling the receipt of construction materials during non-peak travel periods. Appropriate construction traffic control measures (e.g., signs, delineators, etc.) will also be implemented to ensure emergency access to the Project Site and traffic flow is maintained on adjacent right-of-ways. In addition, construction-related traffic generated by the Project does not significantly impact LAPD response times within the Project Site vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

While Project Design Feature TRA-PDF-1 ensures that construction activities do not interfere with LAPD's ability to serve the Project Site, construction of the Project will not result in the need for new or physically altered police stations, the construction of which could cause significant environmental impacts. Therefore, impacts on police protection services during Project construction are less than significant.

(b) Operation

The Project, which will be served by the Hollywood Community Police Station, will introduce additional residential, employment, and visitor population to the Project Site and increase the service population of the Hollywood Community Police Station service area. The Project Site currently generates demand for police protection services from the residential, commercial/retail, and office uses that exist on the Project Site. Accordingly, the Project's estimated net police service population will increase the existing service population of the Hollywood Community Police Station service area. With the increase of residents and visitors to the Project Site, the officer-to-resident ratio will decrease from 2.13 officers per 1,000 residents to approximately 2.09 officers per 1,000 residents within the Hollywood Community Police Station service area, as determined in Section IV.K.1, Public Services – Police, of the Draft EIR. This will have represented a net change of approximately 2 percent, which will be considered minimal. The Hollywood Community Police Station service area officer-to-resident ratio will still have been lower than the Citywide ratio of 2.61 officers per 1,000 residents. The modifications to the Project since the release of the Draft EIR described in Section III, Revisions, Clarifications and Corrections to the Draft EIR, of the Final EIR, have resulted in reducing the Project's

population, which in turn reduces its demand on police services. Therefore, the Project does not significantly change the officer-to-resident ratio of the Hollywood Community Police Station service area.

Assuming that the annual crime rate remains constant at 0.032 crime per capita, the net service population of the Project could potentially generate approximately 94 crimes per year (as compared to the 115 crimes per year reported in the Draft EIR). The total annual number of reported crimes in the service area of the Hollywood Community Police Station could, therefore, could increase from 5,352 crimes to approximately 5,446 crimes, an increase of approximately 1.76 percent. However, the Project incorporates several design features that deter certain types of crime and enhance safety within and immediately surrounding the Project Site, as shown in Project Design Features PS-PDF-2 through PS-PDF-4. As described below, the design features are incorporated into the Project in consideration of the City's "Design Out Crime" and are consistent with the strategies from Crime Prevention Through Environmental Design (CPTED). Specifically, Project Design Feature PS-PDF-2 ensures the Project incorporates a security program that is implemented 24 hours a day/seven days a week to ensure the safety of Project residents, employees, and visitors. In addition, the Project provides sufficient lighting of building entries, walkways, parking structures, elevators, and lobbies to reduce areas of concealment and to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The Project also includes entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways designed to be open and in view of surrounding sites. The Project's design features help offset the Project-related increase in demand for police services. In addition to the implementation of the Project Design Features, the Project will generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could potentially be applied toward the provision of new police facilities and related staffing in the Hollywood Community, as deemed appropriate.

As is the case under existing conditions, emergency vehicles will access the Project Site directly from the surrounding roadways, including Selma Avenue, McCadden Place, Las Palmas Avenue, Sunset Boulevard, and Highland Avenue. Operation of the Project will not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses will be maintained at all times, and the increase in traffic generated by the Project will not significantly impact emergency vehicle response to the Project Site and surrounding uses, including along designated disaster routes. In addition, Section 21806 of the CVC allows drivers of police emergency vehicles to have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, Project operation, including traffic generated by the Project, does not cause a substantial effect on emergency response as a result of increased traffic congestion.

Therefore, the Project does not generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site. Project operation will not necessitate the provision of new or physically altered facilities in order to maintain the LAPD's capability to serve the Project Site; accordingly, the Project does

not result in adverse physical impacts associated with the construction of new or altered facilities. Thus, impacts to police protection services are less than significant.

(c) Cumulative

Each related Project is subject to the City of Los Angeles' routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with the police protection-related goals, objectives, and policies set forth in the General Plan Framework, as listed in the regulatory framework above, the LAPD will also continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs will be identified and monies allocated according to the priorities at the time. In addition, it is anticipated that the related projects will implement Project design features similar to the Project, which will reduce cumulative impacts to police protection services.

With regard to emergency response, the Project and related projects will introduce new uses to the Project Site and the related projects' sites that will generate additional traffic in the vicinity of the Project Site. Traffic from the Project and related projects will have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. The Project does not substantially affect existing emergency response in the service areas of the Hollywood Community Police Station, and the Project does not contribute to a cumulative impact regarding emergency response. As is the case under existing conditions, emergency vehicles access the Project Site and each of the related projects directly from the surrounding roadways. As such, emergency access to the Project Site vicinity will be maintained at all times, and the increase in cumulative traffic generated by the Project and related projects will not significantly impact emergency vehicle response to the Project Site vicinity, including along designated disaster routes. Also, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

2. Fire Protection:

(a) Construction

Construction activities have the potential to result in accidental on-Site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel are trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction will be maintained on-Site. Furthermore, Project construction will occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements

effectively reduces the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Construction of the Project could require temporary lane closures along the Project Site's frontages to construct trenching associated with utility installation. Construction activities also generate traffic associated with the movement of construction equipment, the hauling of materials by construction trucks, and construction worker traffic. As such, construction activities could increase response times for emergency vehicles due to travel time delays caused by traffic. However, construction worker and haul truck trips are expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, as discussed in Section IV.L, Traffic, Access, and Parking, of the Draft EIR, a construction management plan will be implemented during Project construction pursuant to Project Design Feature TRA-PDF-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Features of the construction management plan, which will be developed in consultation with the LADOT, may include limiting potential lane closures to off-peak travel periods, to the extent feasible, and using flag persons to control traffic movement during temporary traffic flow disruptions. In addition, designated truck queuing, equipment staging, and construction worker parking areas shall be provided. Since emergency access to the Project Site will remain clear and unobstructed during construction of the Project, impacts related to LAFD emergency access are less than significant.

Thus, Project construction does not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Therefore, Project-level impacts with regard to fire protection and emergency medical services during construction are less than significant, and no mitigation measures are required.

(b) Operation

(1) Facilities

The following analysis considers existing fire facilities and other factors to consider in determining whether the LAFD will need new or physically altered facilities, the construction of which could cause significant environmental impacts.

The Project Site is currently and will continue to be served by Fire Station No. 27, which is the "first-in" station for the Project Site, located approximately 0.5 mile southeast of the Project Site. In addition, Fire Stations No. 41 and No. 82, located approximately 1.0 mile west and 1.2 miles east of the Project Site, respectively, will continue to be available to serve the Project Site in the event of an emergency.

Upon buildout, the Project will include approximately 950 residential units, 308 hotel rooms, approximately 190,000 square feet of commercial/retail uses, totaling approximately 1,381,000 square feet of floor area (including existing uses to be retained). The Project will result in a net increase of approximately 2,113 residents on the Project Site. Because it will increase the residential service population, and the amount and scale of structural development on Site, the Project will increase the Project Site's demand for LAFD fire protection. However, the Project implements Los Angeles Building and Fire

Code requirements regarding Project components, including, but not limited to, structural design, building materials, Site access, clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with these requirements is demonstrated as part of a plot plan that is submitted to LAFD for review and approval prior to the issuance of a building permit in accordance with City regulations. In addition, as set forth in Project Design Feature PS-PDF-5 and as required by existing regulations, automatic fire sprinkler systems are installed in all new buildings. Compliance with applicable regulatory requirements that are enforced through the City's building permitting process ensures that adequate fire prevention features are provided that reduce the demand on LAFD facilities and equipment. The LAFD has no current plans to construct a new fire station or physically alter an existing facility in the Project vicinity.

(2) Response Distance and Emergency Access

Response distance and emergency access are factors to consider in determining whether the LAFD will need new or physically altered facilities, the construction of which could cause significant environmental impacts. Pursuant to Section 57.507.3.3 of the LAMC, the required response distance for the Project Site is 1.0 mile to a fire station with an engine company and 1.5 miles to a fire station with a truck company. Fire Station No. 27, located at 1327 North Cole Avenue, is approximately 0.5 mile away and is equipped with two engines, one truck, and two ambulances. Therefore, the Project falls within the LAFD's maximum prescribed response distances. Additionally, as set forth in Project Design Feature PS-PDF-5, automatic fire sprinkler systems are installed in all new non-high-rise buildings beyond code requirements to improve safety.

As is the case under existing conditions, emergency vehicles, including those from Fire Station Nos. 27, 41, and 82 in the Project Site vicinity, can access the Project Site directly from the surrounding roadways, including Selma Avenue, McCadden Place, Las Palmas Avenue, Sunset Boulevard, and Highland Avenue. Operation of the Project does not include the installation of barriers (e.g., perimeter fencing, fixed bollards, etc.) that could impede emergency vehicle access within and in the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses will be maintained at all times, and the increase in traffic generated by the Project Site does not significantly impact emergency vehicle response to the Project Site or surrounding uses, including along City-designated disaster routes. In addition, the Project Site is located within the maximum response distances from all three fire stations, whose emergency responders have multiple available routes to access the Project Site. Similarly, the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

(3) Fire Flow

Fire flow is a factor to consider in determining whether the LAFD will need new or physically altered facilities, the construction of which could cause significant environmental impacts. Domestic and water service to the Project Site will continue to be

supplied by the Los Angeles Department of Water and Power (LADWP). Fire flow to the Project Site will be required to meet City of Los Angeles fire flow requirements, as determined by the LAFD. Section 57.507.3.1 of the LAMC establishes fire flow standards by development type. The Project falls within the Industrial and Commercial land use category, which has a required fire flow of 6,000–9,000 gallons per minute (gpm) from four to six adjacent fire hydrants flowing simultaneously. Five of the six fire hydrants closest to the Project Site have the capacity to provide 2,500 gpm each, with localized residual pressures ranging from 35 to 51 psi. The sixth proposed fire hydrant has a capacity for 600 gpm with a residual pressure of 47 pounds per square inch (psi). All fire hydrants exceed the 20 psi requirement, and the combined capacity exceeds the 6,000 to 9,000 gpm fire flow requirement. In conclusion, the Project is within the acceptable response distance to fire stations, and has acceptable emergency access and fire flow. As stated above, LAFD has no current plans to construct a new facility or physically alter an existing one in the Project vicinity. Therefore, the Project will have a less-than-significant impact.

(c) Cumulative

The increase in development and residential service populations from the Project and related projects will result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the related projects will be reviewed on a Project-by-Project basis by the LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection. Furthermore, each related Project will be required to comply with regulatory requirements related to fire protection. Each of the related projects identified in the area will likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations. Similarly, each of the related projects will be subject to the City of Los Angeles' routine construction permitting process, which includes a review by LAFD for compliance with building and Site design standards related to fire life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. Furthermore, over time, LAFD will continue to monitor population growth and land development throughout Los Angeles and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. In addition, LAFD will continue to provide services in response to cumulative growth. As a result, the Project's contribution to cumulative impacts to fire protection is not cumulatively considerable. As such, cumulative impacts on fire protection are less than significant.

3. Schools

(a) Construction

The Project generates part-time and full-time construction jobs between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. Therefore, the construction employment generated by the Project does not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during Project construction are less than significant.

(b) Operation

Taking into consideration the existing uses that will be removed, the Project's residential and non-residential components will generate a total net increase of 743 net new students within LAUSD schools, consisting of 425 net new elementary school students, approximately 106 net new middle school students, and approximately 212 net new high school students.

Based on existing enrollment and capacity data from LAUSD, Bancroft Middle School and Hollywood High School will have adequate capacity to accommodate the new students generated by the Project under existing conditions. However, Selma Elementary School will not have adequate existing capacity to serve the Project under existing conditions. Specifically, based on the total of net new Project-generated students, Selma Elementary will have a seating shortage of 443 students, while Bancroft Middle School and Hollywood High School will have a seating overage of 58 students and 436 students, respectively.

With regard to the projected future capacity during the 2018–2019 academic year (the closest year to the Project build-out year for which projected enrollment and capacity data are available), Selma Elementary School will continue to have a projected seating shortage, while Bancroft Middle School and Hollywood High School will be operating within capacity. Specifically, Selma Elementary School will have a seating shortage of 160 students, Bancroft Middle School will have a seating overage of 427 students, and Hollywood High School will have a seating overage of 1,003 students with the addition of Project-generated students (projected seating overages reported from LAUSD minus Project-generated students).

The number of Project-generated students who could attend LAUSD schools serving the Project Site will likely be less than the above estimate because this analysis does not include LAUSD options that will allow students generated by the Project to enroll at other LAUSD schools (i.e., Magnet Schools, Charter Schools, and Pilot Schools) located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and will move to the Project Site.

Pursuant to Senate Bill 50, the applicant is required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permit. The payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, the applicable development fees for schools to the LAUSD offset the impact of additional student enrollment at schools serving the Project area. With payment of the

applicable school fees per SB 50, impacts on schools are less than significant, and mitigation measures are not required.

(c) Cumulative

There are 145 related projects located in the Project Site vicinity. Of the 145 related projects, 96 are located within the attendance boundaries of Selma Elementary School, Bancroft Middle School, and/or Hollywood High School. As such, these related projects have the potential to combine with the Project and cumulatively generate new students who will attend Selma Elementary School, Bancroft Middle School, or Hollywood High School. These related projects will generate a total of 5,919 students, consisting of 1,277 elementary school students, 1,046 middle school students, and 3,596 high school students, within the school attendance boundaries identified for this Project. The Project generates a net total of approximately 743 new students, consisting of 425 net new elementary school students, approximately 106 net new middle school students, and approximately 212 net new high school students. Therefore, the Project, in combination with the 96 applicable related projects, has the potential to generate a cumulative total of 6,662 new school-aged students. Based on existing 2013–2014 enrollment and capacity data from LAUSD, the schools serving the Project and the 96 applicable related projects will not have adequate capacity to serve the cumulative demand. With the addition of students generated by the Project, in combination with the 96 applicable related projects, Selma Elementary School, Bancroft Middle School, and Hollywood High School will all have seating shortages. These schools will also have seating shortages during the 2018–2019 academic year. Therefore, the students generated by the Project, in combination with the related projects located within the school attendance boundaries, will cause shortages when compared to existing conditions and projected school capacities at Selma Elementary School, Bancroft Middle School, and Hollywood High School.

This degree of cumulative growth substantially increases the demand for LAUSD services in the Project Site area. The Project comprises approximately 13 percent of the total estimated cumulative growth in students. However, as with the Project, future development, including the related projects, will be required to pay development fees for schools to LAUSD prior to the issuance of building permits pursuant to SB 50. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of school impacts generated by the related projects. Therefore, the Project's incremental contribution towards school impacts is not cumulatively considerable, and cumulative impacts are less than significant.

4. Parks and Recreation

(a) Construction

Construction of the Project results in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers will relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with the Project do not result in a notable increase in the residential population of the Project Site area, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

During Project construction, the use of public parks and recreational facilities by construction workers is expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Construction workers may spend their lunch breaks at the parks and recreational facilities near the Project Site, specifically Selma Park, at 6567 Selma Avenue, approximately 1,000 feet (0.17 mile) northeast of the Project Site, and De Longpre Park, at 1350 N. Cherokee Avenue, also approximately 1,000 feet (0.19 mile) south of the Project Site. However, any resulting increase in the use of such parks and recreational facilities will be temporary and will be expected to occur during off-peak park usage hours (i.e., when most potential park patrons are at work or school). Furthermore, it is unlikely that workers will utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes).

Project construction will not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or interfere with existing park usage. The Project's proposed haul route options to/from the US-101 from the Project Site include use of Sunset Boulevard and potentially also Highland Avenue and/or Santa Monica Boulevard. If Santa Monica Boulevard is not utilized, Project-related construction trucks will not travel adjacent to any City park or recreational facility. If Santa Monica Boulevard is used, Project-related construction trucks will pass the Hollywood Recreation Center located at 1122 Cole Avenue. However, such use will be temporary and intermittent throughout construction. In addition, construction trucks will only drive by the recreational facility and will not stage adjacent to the recreational facility. Therefore, use of this haul route is not expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or substantially reduce their service quality.

As such, Project construction does not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Accordingly, impacts on parks and recreational facilities during Project construction is less than significant, and mitigation measures are not required.

(b) Operation

While the Project's estimated 2,318 net new residents are expected to utilize off-Site public parks and recreational facilities to some degree, the Project provides on-Site public and private open space. The Project provides a variety of open space and recreational amenities, including open space and green space, consisting of a series of integrated walkways that connect the mixed-use district created by the Project with the Hollywood neighborhood. The additional landscaped public walkways and the pedestrian paseo that traverse diagonally through the Project Site also promote access and connectivity to and through the Project Site from Sunset Boulevard, Las Palmas Avenue, Selma Avenue, and McCadden Place. The Project also provides a variety of active and passive open space and recreational amenities to serve the needs of Project residents, visitors, and employees, including roof decks and pools, rooftop gardens, community rooms, fitness and recreational facilities, courtyards, landscaped gardens, and common open space with gathering and seating areas.

Furthermore, the Project will pay in-lieu fees in accordance with Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act. Therefore, the Project's residential component will not cause or accelerate substantial physical deterioration of off-Site public parks or recreational facilities.

Similarly, the Project's commercial component, which generates approximately 502 net new employees, could result in a demand for parks and recreational facilities. Project employees may spend their lunch breaks at the parks and recreational facilities near the Project Site, specifically Selma Park, at 6567 Selma Avenue, approximately 1,000 feet (0.17 mile) northeast of the Project Site, and De Longpre Park, at 1350 N. Cherokee Avenue, also approximately 1,000 feet (0.19 mile) south of the Project Site. However, employees are not expected to utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Instead, it is anticipated that Project employees will utilize on-Site open space, resulting in a negligible demand for surrounding parks and recreational facilities. Furthermore, the Project will pay in-lieu fees in accordance with Section 17.12 of the LAMC. Therefore, the Project does not substantially increase the demand for off-Site public parks and recreational facilities.

In addition, in determining the Project's potential impacts to parks and recreational facilities, the potential demand of Project residents for public parks and recreational facilities was also evaluated, as well as the Project's consistency with applicable plans, policies, and regulations related to parks and recreational facilities. As discussed above, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents and employees will generally utilize on-Site open space to meet their recreational needs. Furthermore, the Project meets the applicable requirements set forth in Section 12.21, Section 17.12, and Section 12.33 of the LAMC. However, as an individual Project, the Project by itself does not meet the parkland provision goals set forth in the Public Recreation Plan; however, because these goals are Citywide goals, they are not requirements for, and do not apply to, individual development projects. Additionally, implementation of existing regulatory requirements ensures that the intent of the Public Recreation Plan's parkland standards are met through compliance with state law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Such requirements include the provision of on-Site open space, payment of the Dwelling Unit Construction Tax, and compliance with the City's Quimby Ordinance requirements. Therefore, impacts to parks and recreational facilities are less than significant, and no mitigation measures are required.

(c) Cumulative

Cumulative growth in the greater Project Site area includes specific known development projects, as well as general ambient growth projected to occur. The related projects include retail/commercial, residential, office, and hotel uses, among others. The related projects also include the proposed 38-acre Hollywood Central Park, which will create a 38-acre park that spans above the Hollywood Freeway between Santa Monica Boulevard and Hollywood Boulevard, approximately 1.2 miles east of the Project Site. If constructed, this park will contribute towards meeting the demand for park and recreational space in

the Project Site vicinity. The Hollywood Central Park Project is currently undergoing environmental review.

Approximately 108 of the 145 identified related projects and ambient growth projections fall within a 2-mile radius of the Project Site, the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities. As the population continues to grow in the Project Site area, increased demand will lower the existing parkland to population ratio if new facilities, such as the Hollywood Central Park, are not constructed.

While it is anticipated that the Project's provision of on-Site open space will meet the recreational needs of Project residents, the Project by itself will not, and is not expected to, meet all of the Citywide parkland provision goals set forth in the Public Recreation Plan. Development of the related projects could exacerbate the Community Plan Area's deficiency in parkland per the Public Recreation Plan's standards, with the exception of the Hollywood Central Park related Project, which will make a substantial positive contribution toward meeting these goals. However, it is unknown whether the Hollywood Central Park will be approved and constructed. Notwithstanding, as previously indicated, the standards set forth in the Public Recreation Plan are Citywide goals and are not intended to be requirements for individual development projects, or groups of individual projects. Furthermore, as with the Project, the related projects will undergo discretionary review on a case-by-case basis and will be expected to coordinate with the City of Los Angeles Department of Recreation and Parks. Future development projects will also be required to comply with the park and recreation requirements of Sections 12.21, 17.12, 12.33, and 21.10.3(a)(1) of the LAMC, as applicable.

As such, cumulative impacts on parks and recreation facilities are less than significant. Furthermore, based on the above, the Project's contribution to cumulative impacts to parks and recreational facilities is not cumulatively considerable.

5. Libraries

(a) Construction

The Project results in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, though, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers do not result in a notable increase in resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers will visit Project Site area libraries on their way to/from work or during their lunch hours. Construction workers are more likely to use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers will utilize library facilities on their way to work since the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible.

As such, impacts to library facilities during Project construction are less than significant, and no mitigation measures are required.

(b) Operation

Based on information provided by the Los Angeles Public Library (LAPL), the primary library serving the Project Site is the Hollywood Regional Branch Library, located approximately 0.6 mile east of the Project Site at 1623 North Ivar Avenue. The Will and Ariel Durant Branch Library, at 7140 West Sunset Boulevard, and the John C. Fremont Branch Library, at 6121 Melrose Avenue, are also within a 2-mile radius of the Project Site, the distance that is generally considered to comprise the service area of a library. Therefore, these libraries also provide library services to the Project.

The net increase in residential units as a result of Project development generates a net increase of approximately 2,113 residents on the Project Site, which increases the Project Site's demand for library services. With the addition of the Project's 2,113 estimated net new residents, the service population of the Hollywood Regional Branch Library will increase to 81,057 persons, and the 19,000-square-foot Hollywood Regional Branch Library will continue to meet the building size recommendations set forth in the 2007 Branch Facilities Plan (i.e., 14,500 square feet for a service population over 45,000 or up to 20,000 square feet for a regional branch library) as it does under existing conditions. At the same time, the service population of the Hollywood Regional Branch Library will be below 90,000 persons and will not require the need to consider adding a second branch to the area.

With regard to future library services, the population of the City of Los Angeles Subregion is projected to grow between 2015 (the Project's baseline year) and 2022 (the Project's buildout year) by a rate of approximately 3.49 percent, according to SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (2012-2035 RTP/SCS). Applying this same growth rate to the service area of the Hollywood Regional Branch Library, the estimated service population in 2022 will be 81,699 persons. Thus, with the addition of the Project's 2,113 estimated residents, the service population of the 19,000-square-foot Hollywood Regional Branch Library will be 83,812 persons, and the library will continue to meet the building size recommendations set forth in the 2007 Branch Facilities Plan (i.e., 14,500 square feet for a service population over 45,000 or up to 20,000 square feet for a regional branch library) under future conditions. In addition, the service population of the Hollywood Regional Branch Library will be below 90,000 persons and will not require the need to consider adding a second branch to the area. Furthermore, the LAPL has not indicated that the Hollywood Regional Branch Library is currently experiencing service deficiencies. Thus, even with the addition of Project residents, the Hollywood Regional Branch Library will continue to meet the library sizing standards recommended in the 2007 Branch Facilities Plan under existing and future conditions.

In addition, the Will and Ariel Durant Branch Library and the John C. Fremont Branch Library, which are within two miles of the Project Site, will alleviate the demand placed on the Hollywood Regional Branch Library from Project residents. The Project's residential units are also equipped to receive individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations. As such, the Project does not conflict with or impede implementation of the